

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**R.R. Donnelley & Sons Company
1009 Sloan Street
Crawfordsville, Indiana 47933**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T107-5963-00052	
Issued by: Original Signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 21, 2002 Expiration Date: June 21, 2007

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a book printing and binding operation.

Responsible Official:	Gary Calleo, Vice President and Division Director
Source Address:	1009 Sloan Street, Crawfordsville, Indiana 47933-2741
Mailing Address:	1009 Sloan Street, Crawfordsville, Indiana 47933-2741
Phone Number:	(765) 364-1300
SIC Code:	2732
County Location:	Montgomery
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This book printing and binding operation source consists of the following emission units and pollution control devices:

North Plant:

- (1) Four (4) natural gas or propane fired boilers, with a maximum rating of 20.9 MMBtu (million British thermal units) per hour each:
 - (a) Boiler #1(N) with emissions exhausting through stack SB-4A(N).
 - (b) Boiler #2(N) with emissions exhausting through stack SB-4B(N).
 - (c) Boiler #3(N) with emissions exhausting through stack SB-4C(N).
 - (d) Boiler #4(N) with emissions exhausting through stack SB-4D(N).
- (2) One (1) natural gas or propane fired boiler, with a maximum rating of 2.56 MMBtu(million British thermal units) per hour: Boiler #5(N) with emissions exhausting through stack SB-4E(N).
- (3) Four (4) Paper Trim Cyclones:
 - (a) Paper Trim Cyclone #1(N) emissions exhausting through stack SBP-5H(N).
 - (b) Paper Trim Cyclone #2(N) emissions exhausting through stack SBP-5I(N).
 - (c) Paper Trim Cyclone #3(N) emissions exhausting through stack SBP-5J(N).
 - (d) Paper Trim Cyclone #4(N) emissions exhausting through stack SBP-5K(N).

- (4) Three (3) Paper Dust Collectors:
 - (a) Dust Collector #1(N) consists of a cyclone followed by a baghouse for particulate control and is exhausted through SD-6A(N).
 - (b) Dust Collector #2(N) consists of a baghouse for particulate control and is exhausted through SD-6B(N).
 - (c) Dust Collector #3(N) consists of a cyclone and followed by two (2) baghouses for particulate control and is exhausted through SD-6C(N).
- (5) One (1) In-line Stainer 192 used for edge staining paper using low pressure-high volume spray coating and using dry filters for overspray control and exhausting through stack BS-4X(N).
- (6) Two (2) heatset web offset lithographic printing presses, controlled by one (1) 7.6 MMBtu per hour natural gas fired thermal oxidizer ("North Oxidizer") exhausting to one (1) stack identified as SP-5Y(N), including:
 - (a) One (1) Mitsubishi heatset web offset lithographic printing press with two (2) units and two (2) webs identified as Press 268 with a maximum line speed of 1600 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment; and
 - (b) One (1) Toshiba heatset web offset lithographic printing Press with four (4) units and two (2) webs identified as Press 269 with a maximum line speed of 1600 feet per minute and a maximum printing width of 50 inches, with associated in-line equipment.
- (7) One (1) Hantscho heatset web offset lithographic printing Press with two (2) units and two (2) webs identified as Press 240 with a maximum line speed of 1000 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5R(N).
- (8) One (1) KBA Compacta heatset web offset lithographic printing Press with two (2) units and two (2) webs identified as Press 241 with a maximum line speed of 1100 feet per minute and a maximum printing width of 26 inches, with associated in-line equipment, exhausting to one (1) stack SP-5S(N).
- (9) One (1) Hantscho heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 245 with a maximum line speed of 1000 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5Q(N).
- (10) One (1) Timson heatset web offset lithographic printing press with one (1) unit and one (1) web identified as Press 242 with a maximum line speed of 1200 feet per minute and a maximum printing width of 47 inches, with associated in-line equipment, exhausting to one (1) stack SP-5Z(N).
- (11) One (1) Timson heatset web offset lithographic printing press with one (1) unit and one (1) web identified as Press 243 with a maximum line speed of 1200 feet per minute and a maximum printing width of 47 inches, with associated in-line equipment, exhausting to one (1) stack SP-5AA(N).
- (12) One (1) Harris heatset web offset lithographic printing press with two (2) units and two (2)

- webs identified as Press 285 with a maximum line speed of 825 feet per minute and a maximum printing width of 26 inches, with associated in-line equipment, exhausting to one (1) stack SP-5K(N).
- (13) One (1) Harris heatset web offset lithographic printing press with two (2) units and two (2) webs identified as Press 286 with a maximum line speed of 825 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5L(N).
- (14) One (1) Harris heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 287 with a maximum line speed of 825 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5M(N).
- (15) One (1) Harris heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 288 with a maximum line speed of 825 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5N(N).
- (16) One (1) Harris heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 289 with a maximum line speed of 825 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5O(N).
- (17) Four (4) UV sheetfed offset lithographic presses:
- (a) One (1) Heidelberg UV sheetfed offset lithographic press identified as Press 232 with a maximum line speed of 317 feet per minute and a maximum printing width of 25.5 inches including five (5) units and coater, exhausting to one (1) stack SP-5U(N) used as cooling air for UV lamps.
 - (b) One (1) Heidelberg UV sheetfed offset lithographic press identified as Press 233 with a maximum line speed of 317 feet per minute and a maximum printing width of 25.5 inches including five (5) units and coater, exhausting to one (1) stack SP-5U(N) used as cooling air for UV lamps.
 - (c) One (1) Heidelberg UV sheetfed offset lithographic press identified as Press 238 with a maximum line speed of 434 feet per minute and a maximum printing width of 40 inches including six (6) units and coater, exhausting to one (1) stack SP-5V(N) used as cooling air for UV lamps.
 - (d) One (1) Heidelberg UV sheetfed offset lithographic press identified as Press 239 with a maximum line speed of 473 feet per minute and a maximum printing width of 40 inches including two (2) units and coater, exhausting to one (1) stack SP-5W(N) used as cooling air for UV lamps.
- (18) One (1) conventional sheetfed offset lithographic press identified as Press 254 with a maximum line speed of 299 feet per minute and a maximum printing width of 60 inches.

South Plant:

- (1) Three (3) natural gas or propane fired boilers, with a maximum rating of 25.1 MMBtu (million British thermal units) per hour each:
- (a) Boiler #1(S) with emissions exhausting through stack SB-4A(S).

- (b) Boiler #2(S) with emissions exhausting through stack SB-4B(S).
- (c) Boiler #3(S) with emissions exhausting through stack SB-4C(S).
- (2) Four (4) Paper Trim Cyclones:
 - (a) Paper Trim Cyclone #1(S) emissions exhausting through stack SBP-5E(S).
 - (b) Paper Trim Cyclone #2(S) emissions exhausting through stack SBP-5E(S).
 - (c) Paper Trim Cyclone #3(S) emissions exhausting through stack SBP-5E(S).
 - (d) Paper Trim Cyclone #4(S) emissions exhausting through stack SBP-5E(S).
- (3) Two (2) Paper Dust Collectors:
 - (a) Dust Collector #1(S) consists of a cyclone followed by two (2) baghouses for particulate control and is exhausted through SD-6A(S).
 - (b) Dust Collector #2(S) consists of a baghouse for particulate control and is exhausted through SD-6B(S).
- (4) One (1) Mitsubishi heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 262 with a maximum line speed of 1708 feet per minute and a maximum printing width of 61 inches, with associated in-line equipment, controlled by one (1) 1.894 MMBtu per hour natural gas fired thermal oxidizer ("South Oxidizer") exhausting to one (1) stack identified as SP-5N(S).
- (5) One (1) Hantscho heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 270 with a maximum line speed of 807 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to SP-5F(S).
- (6) One (1) Cottrell heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 272 with a maximum line speed of 1000 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment, exhausting to one (1) stack SP-5D(S).
- (7) One (1) Mitsubishi heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 273 with a maximum line speed of 1615 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment, exhausting to one (1) stack SP-5L(S).
- (8) One (1) Cottrell heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 274 with a maximum line speed of 1000 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment, exhausting to one (1) stack SP-5C(S).
- (9) One (1) Cottrell heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 276 with a maximum line speed of 1200 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment, exhausting to one (1) stack SP-5E(S).
- (10) One (1) Toshiba heatset web offset lithographic printing press with four (4) units and one

- (1) web identified as Press 260 with a maximum line speed of 1615 feet per minute and a maximum printing width of 36 inches, with associated in-line equipment, exhausting to one (1) stack SP-5I(S).
- (11) One (1) Toshiba heatset web offset lithographic printing press with four (4) units and one (1) web identified as Press 261 with a maximum line speed of 1500 feet per minute and a maximum printing width of 36 inches, with associated in-line equipment, exhausting to one (1) stack SP-5J(S).
- (12) One (1) Hantscho heatset web offset lithographic printing press with one (1) unit and one (1) web identified as Press 290 with a maximum line speed of 800 feet per minute and a maximum printing width of 26 inches, with associated in-line equipment, exhausting to one (1) stack SP-5G(S).
- (13) One (1) Hantscho heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 291 with a maximum line speed of 800 feet per minute and a maximum printing width of 26 inches, with associated in-line equipment, exhausting to one (1) stack SP-5H(S).
- (14) One (1) Hantscho heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 293 with a maximum line speed of 1000 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5K(S).
- (15) One (1) Hantscho heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 294 with a maximum line speed of 1076 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5M(S).
- (16) One (1) Hantscho heatset web offset lithographic printing press with two (2) units and two (2) webs identified as Press 295 with a maximum line speed of 1000 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5P(S).
- (17) One (1) Harris heatset web offset lithographic printing press with two (2) units and two (2) webs identified as Press 296 with a maximum line speed of 860 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5Q(S).
- (18) One (1) Heidelberg sheetfed offset lithographic press identified as Press 258 with a maximum line speed of 505 feet per minute and a maximum printing width of 40.5 inches including six (6) units and coater, exhausting to one (1) stack SP-5R(S) used as cooling air for electric heaters.
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]
-
- This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.
- A.4 Part 70 Permit Applicability [326 IAC 2-7-2]
-
- This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:
- (a) It is a major source, as defined in 326 IAC 2-7-1(22);

- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-601

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

-
- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, . IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967
 - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

- (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (2) If IDEM, OAQ, , upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, , takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, , any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the Responsible official as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 Opacity [326 IAC 5-1]
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 Stack Height [326 IAC 1-7]
The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d)(3), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to

thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015

Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (b) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP);

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Compliance Response Plan -Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this

condition.

- (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ

may extend the retesting deadline.

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: (Natural gas fired boilers)

North Plant:

- (1) Four (4) natural gas or propane fired boilers, with a maximum rating of 20.9 MMBtu (million British thermal units) per hour each:
 - (a) Boiler #1(N) with emissions exhausting through stack SB-4A(N).
 - (b) Boiler #2(N) with emissions exhausting through stack SB-4B(N).
 - (c) Boiler #3(N) with emissions exhausting through stack SB-4C(N).
 - (d) Boiler #4(N) with emissions exhausting through stack SB-4D(N).
- (2) One (1) natural gas or propane fired boiler, with a maximum rating of 2.56 MMBtu(million British thermal units) per hour: Boiler #5(N) with emissions exhausting through stack SB-4E(N).

South Plant:

- (1) Three (3) natural gas or propane fired boilers, with a maximum rating of 25.1 MMBtu (million British thermal units) per hour each:
 - (a) Boiler #1(S) with emissions exhausting through stack SB-4A(S).
 - (b) Boiler #2(S) with emissions exhausting through stack SB-4B(S).
 - (c) Boiler #3(S) with emissions exhausting through stack SB-4C(S).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter Limitation (PM) [326 IAC 6-2-3]

Particulate limitations for Boilers #1(N), #2(N), #3(N), #4(N), #5(N), #1(S), # 2(S) and #3(S) shall be 0.3315 pound particulate matter per MMBtu. Compliance with this limitation is confirmed based on the total PM emission factor for natural gas fired boilers as found in Table 1.4-2 of Supplemental D, March 1998, to the 5th Edition of AP-42, January 1995, of 7.6 pounds per million cubic feet of gas burned.

This limitation is based on the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

where

C = 50 u/m³

Pt = emission rate limit (lbs/MMBtu)

Q = total source heat input capacity (MMBtu/hr)

N = number of stacks

a = plume rise factor (0.67)

h = stack height (ft)

D.1.2 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1]

Sulfur content limits for Boiler #1(N), Boiler #2(N), Boiler #3(N), Boiler #4(N), Boiler #5(N), Boiler #1(S), Boiler #2(S) and Boiler #3(S) are not applicable, because they are not capable of burning #2 fuel oil and burn only natural gas and propane and the SO₂ PTE less than 25 tpy.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.4 Reporting Requirements

The Permittee shall certify, on the form provided, that natural gas was fired in the boiler at all times during each quarter. Alternatively, the Permittee shall report the number of days during which an alternative fuel was burned during each quarter.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Paper Trim Cyclones and Dust Collectors

North:

- (3) Four (4) Paper Trim Cyclones:
 - (a) Paper Trim Cyclone #1(N) emissions exhausting through stack SBP-5H(N).
 - (b) Paper Trim Cyclone #2(N) emissions exhausting through stack SBP-5I(N).
 - (c) Paper Trim Cyclone #3(N) emissions exhausting through stack SBP-5J(N).
 - (d) Paper Trim Cyclone #4(N) emissions exhausting through stack SBP-5K(N).
- (4) Three (3) Paper Dust Collectors:
 - (a) Dust Collector #1(N) consists of a cyclone followed by a baghouse for particulate control and is exhausted through SD-6A(N).
 - (b) Dust Collector #2(N) consists of a baghouse for particulate control and is exhausted through SD-6B(N).
 - (c) Dust Collector #3(N) consists of a cyclone and followed by two (2) baghouses for particulate control and is exhausted through SD-6C(N).

South:

- (2) Four (4) Paper Trim Cyclones:
 - (a) Paper Trim Cyclone #1(S) emissions exhausting through stack SBP-5E(S).
 - (b) Paper Trim Cyclone #2(S) emissions exhausting through stack SBP-5E(S).
 - (c) Paper Trim Cyclone #3(S) emissions exhausting through stack SBP-5E(S).
 - (d) Paper Trim Cyclone #4(S) emissions exhausting through stack SBP-5E(S).
- (3) Two (2) Paper Dust Collectors:
 - (a) Dust Collector #1(S) consists of a cyclone followed by two (2) baghouses for particulate control and is exhausted through SD-6A(S).
 - (b) Dust Collector #2(S) consists of a baghouse for particulate control and is exhausted through SD-6B(S).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Particulate emission limitations for Paper Trim Cyclones #1(N), #2(N), #3(N), #4(N), #1(S), #2(S), #3(S) and #4(S) shall be 10.4 pounds per hour per cyclone, established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour.}$$

The Permittee shall demonstrate compliance with this limit based on an emission factor of one pound of dust emitted per ton of paper handled,

Particulate emission limitation for Dust Collectors #1(N), #2(N), #3(N), #1(S) and #2(S) shall be 0.551 pound per hour per Dust Collector which shall be achieved by the use of baghouse pollution control devices, in accordance with Section C.1-Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour 326

IAC 6-3-2(c).

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.3 Particulate Matter (PM)

The baghouses for PM control shall be in operation and control emissions from the Paper Dust Collectors at all times that the Paper Dust Collectors are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.4 Visible Emissions Notations

- (a) Daily visible emission notations of the baghouses' stacks exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the Paper Dust Collectors, at least once weekly when the Paper Dust Collectors are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.2.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the Paper Dust Collectors when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the baghouse stack exhausts when venting to the atmosphere.
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain weekly records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle operation.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITION

Facility Description [326 IAC 2-7-5(15)]: Printing Presses

North:

(5) One (1) In-line Stainer 192 used for edge staining paper using low pressure-high volume spray coating and using dry filters for overspray control and exhausting through stack BS-4X(N).

(6) Two (2) heatset web offset lithographic printing presses, controlled by one (1) 7.6 MMBtu per hour natural gas fired thermal oxidizer ("North Oxidizer") exhausting to one (1) stack identified as SP-5Y(N), including:

(a) One (1) Mitsubishi heatset web offset lithographic printing press with two (2) units and two (2) webs identified as Press 268 with a maximum line speed of 1600 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment; and

(b) One (1) Toshiba heatset web offset lithographic printing press with two (2) units and two (2) webs identified as Press 269 with a maximum line speed of 1600 feet per minute and a maximum printing width of 50 inches, with associated in-line equipment.

(7) One (1) Hantscho heatset web offset lithographic printing press with two (2) units and two (2) webs identified as Press 240 with a maximum line speed of 1000 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5R(N).

(8) One (1) KBA Compacta heatset web offset lithographic printing press with two (2) units and two (2) webs identified as Press 241 with a maximum line speed of 1100 feet per minute and a maximum printing width of 26 inches, with associated in-line equipment, exhausting to one (1) stack SP-5S(N).

(9) One (1) Hantscho heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 245 with a maximum line speed of 1000 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5Q(N).

(10) One (1) Timson heatset web offset lithographic printing press with one (1) unit and one (1) web identified as Press 242 with a maximum line speed of 1200 feet per minute and a maximum printing width of 47 inches, with associated in-line equipment, exhausting to one (1) stack SP-5Z(N).

(11) One (1) Timson heatset web offset lithographic printing press with one (1) unit and one (1) web identified as Press 243 with a maximum line speed of 1200 feet per minute and a maximum printing width of 47 inches, with associated in-line equipment, exhausting to one (1) stack SP-5AA(N).

(12) One (1) Harris heatset web offset lithographic printing press with two (2) units and two (2) webs identified as Press 285 with a maximum line speed of 825 feet per minute and a maximum printing width of 26 inches, with associated in-line equipment, exhausting to one (1) stack SP-5K(N).

(13) One (1) Harris heatset web offset lithographic printing press with two (2) units and two (2) webs identified as Press 286 with a maximum line speed of 825 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5L(N).

(14) One (1) Harris heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 287 with a maximum line speed of 825 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5M(N).

(15) One (1) Harris heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 288 with a maximum line speed of 825 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5N(N).

(16) One (1) Harris heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 289 with a maximum line speed of 825 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5O(N). coater, exhausting to one (1) stack SP-5V(N) used as cooling air for UV lamps.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.

Facility Description [326 IAC 2-7-5(15)]:

(17) Four (4) UV sheetfed offset lithographic presses:

(a) One (1) Heidelberg UV sheetfed offset lithographic press identified as Press 232 with a maximum line speed of 317 feet per minute and a maximum printing width of 25.5 inches including five (5) units and coater, exhausting to one (1) stack SP-5U(N) used as cooling air for UV lamps.

(b) One (1) Heidelberg UV sheetfed offset lithographic press identified as Press 233 with a maximum line speed of 317 feet per minute and a maximum printing width of 25.5 inches including five (5) units and coater, exhausting to one (1) stack SP-5U(N) used as cooling air for UV lamps.

(c) One (1) Heidelberg UV sheetfed offset lithographic press identified as Press 238 with a maximum line speed of 434 feet per minute and a maximum printing width of 40 inches including six (6) units and coater, exhausting to one (1) stack SP-5V(N) used as cooling air for UV lamps.

(d) One (1) Heidelberg UV sheetfed offset lithographic press identified as Press 239 with a maximum line speed of 473 feet per minute and a maximum printing width of 40 inches including two (2) units and coater, exhausting to one (1) stack SP-5W(N) used as cooling air for UV lamps.

(18) One (1) conventional sheetfed offset lithographic press identified as Press 254 with a maximum line speed of 299 feet per minute and a maximum printing width of 60 inches.

South:

(4) One (1) Mitsubishi heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 262 with a maximum line speed of 1708 feet per minute and a maximum printing width of 61 inches, with associated in-line equipment, controlled by one (1) 1.894 MMBtu per hour natural gas fired thermal oxidizer ("South Oxidizer") exhausting to one (1) stack identified as SP-5N(S).

(5) One (1) Hantscho heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 270 with a maximum line speed of 807 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to SP-5F(S).

(6) One (1) Cottrell heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 272 with a maximum line speed of 1000 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment, exhausting to one (1) stack SP-5D(S).

(7) One (1) Mitsubishi heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 273 with a maximum line speed of 1615 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment, exhausting to one (1) stack SP-5L(S).

(8) One (1) Cottrell heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 274 with a maximum line speed of 1000 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment, exhausting to one (1) stack SP-5C(S).

(9) One (1) Cottrell heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 276 with a maximum line speed of 1200 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment, exhausting to one (1) stack SP-5E(S).

(10) One (1) Toshiba heatset web offset lithographic printing press with four (4) units and one (1) web identified as Press 260 with a maximum line speed of 1615 feet per minute and a maximum printing width of 36 inches, with associated in-line equipment, exhausting to one (1) stack SP-5I(S).

(11) One (1) Toshiba heatset web offset lithographic printing press with four (4) units and one (1) web identified as Press 261 with a maximum line speed of 1500 feet per minute and a maximum printing width of 36 inches, with associated in-line equipment, exhausting to one (1) stack SP-5J(S).

(12) One (1) Hantscho heatset web offset lithographic printing press with one (1) unit and one (1) web identified as Press 290 with a maximum line speed of 800 feet per minute and a maximum printing width of 26 inches, with associated in-line equipment, exhausting to one (1) stack SP-5G(S).

(13) One (1) Hantscho heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 291 with a maximum line speed of 800 feet per minute and a maximum printing width of 26 inches, with associated in-line equipment, exhausting to one (1) stack SP-5H(S).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Facility Description [326 IAC 2-7-5(15)]:

- (14) One (1) Hantscho heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 293 with a maximum line speed of 1000 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5K(S).
(15) One (1) Hantscho heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 294 with a maximum line speed of 1076 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5M(S).
(16) One (1) Hantscho heatset web offset lithographic printing press with two (2) units and two (2) webs identified as Press 295 with a maximum line speed of 1000 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5P(S).
(17) One (1) Harris heatset web offset lithographic printing press with two (2) units and two (2) webs identified as Press 296 with a maximum line speed of 860 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5Q(S).
(18) One (1) Heidelberg sheetfed offset lithographic press identified as Press 258 with a maximum line speed of 505 feet per minute and a maximum printing width of 40.5 inches including six (6) units and coater, exhausting to one (1) stack SP-5R(S) used as cooling air for electric heaters.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

- (a) The VOC content delivered to the applicator of each press shall be limited such that VOC emitted is less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply. VOC emitted will be based on the following equation:

VOC emissions (tpy) = (ink usage X volatile content X 80% flash off) + (fountain solution usage X volatile content X 100% flash off) + (cleaner usage X volatile content X 50% flash off)

The following presses shall be limited:

Press 240, Press 241, Press 245, Press 289, Press 238, Press 239, Press 260, Press 261, Press 273, Press 290, Press 291, Press 293, Press 294, Press 295, and Press 296,

The requirements from Registered Construction and Operation Status letter issued June 19, 1988 (Press 240), and Registered Construction and Operation Status letter issued October 23, 1991 (Press 241), state that "Any change or modification which may increase the volatile organic compound potential emissions to 25 tons per year or more from the equipment covered in this registration must be approved by OAQ before such change may occur." The previous operating permits did not anticipate that the potential emissions would be greater than 25 tons per year and therefore did not address the requirements of 326 IAC 8-1-6. The source limited the running time in order to keep VOC emissions below 25 tons per year. Descriptions in Title V operating permits are for descriptive information and do not constitute enforceable conditions.

The requirements from Registered Construction and Operation Status letter issued on November 8, 1989 and Registered Construction and Operation Status letter issued on February 2, 1987 (Press 260 and Press 261) to limit VOC emissions by limiting running

time to 5000 hours per year; and PC (54) 1853 issued October 20, 1990 limiting impressions, and usage of ink, fountain solution, and cleaning solution, maintain a log of information and submit a quarterly report for monthly hour usage are replaced with the new limits.

The requirements from PC (54) 1746 issued on May 3, 1989 (Press 245) limiting hours of operation, limiting by press description, maintenance of a log of information and quarterly reporting of hours used ; PC (54) 1740 issued on April 5, 1989 (Press 293) limiting hours of operation, limiting by press description; Registered Construction (107) 2045 issued October 17, 1991 (Press 294) limiting by press description and pound per hour of ink and solution usage; Registered Construction and Operation Status CP 107-2947 issued April 23, 1993 (Press 296) limiting by press description; and Registered Construction and Operation Status CP 107-3433 issued January 21, 1994 (Press 296) limiting by press description are replaced with the new limits. Descriptions in Title V operating permits are for descriptive information and do not constitute enforceable conditions.

The requirements from PC (54) 1257 issued July 11, 1978 (Press 287 and Press 288), PC (34) 1285 issued on September 6, 1978 (Press 286) and PC (54) 1398 issued on June 18, 1979 limiting hydrocarbons (Press 270) and requiring the use of non-photochemically reactive hydrocarbons, are replaced because these presses were constructed prior to January 1, 1980 and are not subject to Article 8 rules. Also included are presses Press 285, Press 254, Press 272, Press 274 and Press 276 which were also built prior to January 1, 1980.

Exempt Construction and Operation Status CP 107-4781 issued September 28, 1995 (Press 258) is still in effect, any change or modification which may increase the volatile organic compound potential emissions to more than 15 lbs per day must be reported to IDEM, OAQ.

Remaining presses will be limited as follows:

- (b) The VOC content delivered to the applicator of the press shall be limited such that VOC emitted is less than twenty-five (25) tons combined pressroom emissions from Press 232 and Press 233 (combined) per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply. VOC emitted will be based on the following equation:

$$\text{VOC emissions (tpy)} = (\text{ink usage} \times \text{volatile content} \times 80\% \text{ flash off}) + (\text{fountain solution usage} \times \text{volatile content} \times 100\% \text{ flash off}) + (\text{cleaner usage} \times \text{volatile content} \times 50\% \text{ flash off})$$

The requirements from Registered Construction and Operation Status (107) 2042 issued on July 11, 1991 (Press 232 and Press 233) to use an ultraviolet light curing system to limit VOC releases from the ink, the requirements to use a less volatile printing aid than isopropyl alcohol* and limiting fountain solution to 2.5 percent VOC per gallon is being replaced with new language and limits because in order to maintain consistency in permit language, reporting and monitoring, it is intended to limit the VOC, rather than hours, impressions and limiting volatile content of solutions or press descriptions. Descriptions in Title V operating permits are for descriptive information and do not constitute enforceable conditions.

Amendment 107-10512-00052 issued March 15, 1999 allowed usage of isopropyl alcohol at 750 pounds per year as part of the fountain solution and shall remain in effect.

- (c) Pursuant to CP 107-4233 issued April 20, 1995, VOC input usage to Presses Press 242

and Press 243 shall be not exceed a combined 39 tons per year, based on 80% VOC flash-off during web heatset ink usage, calculated on a 12 month rolling monthly average. That the total amount of VOC delivered to each press individually, including clean-up solvents, shall not exceed 25 tons per year, per press, based on 80% VOC flash-off during web heatset ink usage, calculated on a 12 month rolling monthly average.

- (d) Presses 268 and 269 will be controlled by the North Oxidizer, a 7.6 MMBtu per hr thermal oxidizer, and Press 262 will be controlled by the South Oxidizer, a 1.894 MMBtu per hr thermal oxidizer. The thermal oxidizers shall be in operation at all times during which any of the printing presses controlled by the oxidizers are in operation. Pursuant to CP 107-2726 issued on February 26, 1993 and CP 107-2917 issued on April 6, 1993 the controls of the press, dryer and thermal afterburner for Presses 268 and 269 shall be interlocked such that the press and dryer cannot be operated until such time that the combustion temperature in the thermal afterburner has attained the minimum temperature determined in testing requirements to destroy at least 90% of captured VOC.

The requirements from CP 107-2726 issued on February 26, 1993 and CP 107-2917 issued on April 6, 1993, conditions #5, #7, #8, #9 and CP 107-2478 issued on June 17, 1992 conditions #4, and #5, were removed and have been replaced with new requirements, in order to regulate all thermal oxidizer within the entire facility on the same parameters, monitoring and reporting schedule to maintain compliance with 326 IAC 8-1-6 (BACT).

D.3.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The VOC content delivered to Stainer 192 shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

D.3.3 Clean-up Solvent VOC Emissions Control

The VOC flash off for clean-up solvent is 100%. As derived from "USEPA's Alternative Control Techniques Document: Offset Lithographic Printing (EPA 453/R-94 054, June 1994), the accepted shop towel retention factor for clean-up solvent is 50%. A 50% reduction in flash off shall be used in VOC emissions formula in D.3.1 as an emission control technique and shall meet the following conditions:

- (e) The clean-up solvent shall have a VOC content of thirty percent (30%) or less, by weight, or a composite vapor pressure less than or equal to ten (10) millimeters of mercury (Hg) at twenty degrees Celcius (20° C); and
- (f) The clean-up solvents shall be kept in tightly covered tanks or containers during transport and storage; and
- (g) The cleaning cloths used with the clean-up solvents shall be placed in tightly closed containers when not in use and while awaiting off-site transport. The cleaning cloths shall be properly cleaned and disposed.

D.3.4 VOC Emissions

Compliance with Condition D.3.1 and D.3.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period and appropriate flash off factors.

D.3.5 Particulate Matter (PM) [326 IAC 6-3]

The PM from Stainer 192 shall not exceed the pound per hour emission rate established as E in

the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.3.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.3.7 Particulate Matter (PM)

The dry filters shall be in operation at all times Stainer 192 is in operation, in order to comply with this limit.

D.3.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Compliance stack tests shall be performed on the thermal oxidizers to determine the operating temperature and fan amperage or duct velocity at 90% minimum destruction of VOC within 180 days of issuance of this permit. These tests shall be repeated once every two and one (2 1/2) years. These tests shall be performed using methods approved by the OAQ. The OAQ shall be notified of the actual test date at least two weeks prior to the date, a test protocol shall be submitted to the OAQ, Compliance Data Section, 35 days in advance of the test, and all test reports must be received by the OAQ within 45 days of the completion of the testing.

D.3.9 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.3.1 and D.3.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.3.10 Thermal Oxidizer

- (a) The North Oxidizer shall operate at all times that either of the Presses 268 or 269 are operating. The South Oxidizer shall operate at all times that Press 262 is in operation. When operating, the thermal oxidizers shall maintain a minimum operating temperature of 1350° F or the temperature and fan amperage or duct velocity determined at the stack tests that achieves a minimum 90% destruction efficiency of the VOC.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.11 Parametric Monitoring

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizers for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) The duct pressure or fan amperage shall be observed at least once per week when the thermal oxidizer is in operation. This pressure or amperage shall be maintained within the range as established in most recent compliant stack test.
- (c) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above established range for any one reading.

D.3.12 Particulate Matter Monitoring

- (a) Pursuant to CP 107-2853 daily inspection from the in-line Stainer Press 192 shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while in operation. The Compliance Response Plan for this unit shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. During periods of inclement weather, these inspections shall be performed as weather permits. The Compliance Response Plan for this unit shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.13 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.1, D.3.2 and D.3.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.3.1, D.3.2 and D.3.3
 - (1) The amount and VOC content of each ink, fountain solution, coating material and solvent used. Records shall include purchase orders, invoices, material safety data sheets (MSDS) and other documentation necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and ink and those used as cleanup solvents;
 - (2) The volume weighted VOC content of the coatings used for each month;
 - (3) The total VOC usage for each month; and
 - (4) The weight of VOCs emitted for each compliance period.
 - (5) The VOC content of the used shop towels.
- (b) To document compliance with Condition D.3.12, the Permittee shall maintain a log of weekly overspray observations.
- (c) To document the compliance with Condition D.3.10 and D.3.11, the continuous temperature records for the thermal oxidizers and the temperature used to demonstrate compliance during the most recent compliance stack test and weekly records of the duct pressure or fan amperage.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.14 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1 and D.3.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: R.R. Donnelley & Sons Company
Source Address: 1009 Sloan Street, Crawfordsville, Indiana 47933-2741
Mailing Address: 1009 Sloan Street, Crawfordsville, Indiana 47933-2741
Part 70 Permit No.: T107-5963-00052

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
AIR COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: R.R. Donnelley & Sons Company
Source Address: 1009 Sloan Street, Crawfordsville, Indiana 47933-2741
Mailing Address: 1009 Sloan Street, Crawfordsville, Indiana 47933-2741
Part 70 Permit No.: T107-5963-00052:

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <p>9 This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><input type="checkbox"/> The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and<input type="checkbox"/> The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16. |
|---|

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: R.R. Donnelley & Sons Company
Source Address: 1009 Sloan Street, Crawfordsville, Indiana 47933-2741
Mailing Address: 1009 Sloan Street, Crawfordsville, Indiana 47933-2741
Part 70 Permit No.: T107-5963-00052

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Report period

Beginning: _____

Ending: _____

Boiler Affected

Alternate Fuel

Days burning alternate fuel

From

To

(can omit identification of boiler affected if only one gas boiler at this plant)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: _____

Printed Name: _____

Title/Position: _____

Date: _____

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: R.R. Donnelley & Sons Company

Source Address: 1009 Sloan Street, Crawfordsville, Indiana 47933-2741

Mailing Address: 1009 Sloan Street, Crawfordsville, Indiana 47933-2741

Part 70 Permit No.: T107-5963-00052

Facilities: (per press) Press 240, Press 241, Press 245, Press 289, Press 260, Press 261, Press 290, Press 291, Press 293, Press 273, Press 294, Press 295, Press 296, Press 258, Press 238, Press 239, and Press 232 and Press 233 (combined)

Parameter: VOC

Limit:: The VOC content delivered to the applicator of the press shall be limited such that VOC emitted is less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply. VOC emitted will be based on the following equation:

VOC emissions (tpy)= (ink usage X volatile content X 80% flash off)+ (fountain solution usage X volatile content X 100% flash off) + (cleaner usage X volatile content X 50% flash off)

Press: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

A certification is required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: R.R. Donnelley & Sons Company
Source Address: 1009 Sloan Street, Crawfordsville, Indiana 47933-2741
Mailing Address: 1009 Sloan Street, Crawfordsville, Indiana 47933-2741
Part 70 Permit No.: T107-5963-00052
Facility: Presses Press 242 and Press 243
Parameter: VOC

Limit: VOC input usage shall be not exceed a combined 39 tons per year, based on 80% VOC flash-off during web heatset ink usage, calculated on a 12 month rolling monthly average. That the total amount of VOC delivered to each press individually, including clean-up solvents, shall not exceed 25 tons per year, per press, based on 80% VOC flash-off during web heatset ink usage, calculated on a 12 month rolling monthly average. (Assuming 100% VOC flash off for fountain solution and 50% VOC flash off for cleaner usage)

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

A certification is required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION and COMPLIANCE MONITORING REPORT**

Source Name: R.R. Donnelley & Sons Company
Source Address: 1009 Sloan Street, Crawfordsville, Indiana 47933-2741
Mailing Address: 1009 Sloan Street, Crawfordsville, Indiana 47933-2741
Part 70 Permit No.: T107-5963-00052

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: R.R. Donnelley & Sons Company
Source Address: 1009 Sloan Street, Crawfordsville, Indiana 47933-2741
Mailing Address: 1009 Sloan Street, Crawfordsville, Indiana 47933-2741
Part 70 Permit No.: T107-5963-00052
Facility: In-line Stainer 192
Parameter: VOC
Limit: VOC input usage shall be less than twenty-five (25) tons per twelve (12) consecutive month period.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

A certification is required for this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: R.R. Donnelley & Sons Company
Source Location: 1009 Sloan Street, Crawfordsville, Indiana 47933-2741
County: Montgomery
SIC Code: 2732
Operation Permit No.: T107-5963-00052
Permit Reviewer: Teresa Freeman

On November 13, 2000, the Office of Air Quality (OAQ) had a notice published in the Journal Review, Crawfordsville, Indiana, stating that R.R. Donnelley & Sons Company had applied for a Part 70 Operating Permit to operate a book printing and binding operation. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On December 18, 2000, R.R. Donnelley & Sons Company submitted comments on the proposed Part 70 permit. The summary of the comments (**bolded** language has been added, the language with a line through it has been deleted) is as follows:

Comment 1:

The descriptions of Press 269, Press 262, Press 273, Press 291 and Press 296 need to be revised to reflect the correct web width and number of webs and units. In addition, a distinction between control devices at the North and South Plants needs to be added. Description of Stainer 192 also need to be revised.

Response 1:

The descriptions of Press 269, Press 262, Press 273, Press 291 and Press 296 have been changed to reflect the updated information to the facility that the source provided after Public Notice of the permit. The distinction between control devices at the North and South Plants was also changed, as well as the description of Stainer 192.

Changes made to the final permit in response to comment 2 are as follows:

A.2 and D.3 (North)

- (5) One (1) In-line ~~book Stainer (spray booth)~~ identified as Stainer 192 used for edge staining paper using low pressure-high volume spray coating and using dry filters for overspray control and exhausting through stack BS-4X(N).
- (6) Two (2) heatset web offset lithographic printing presses, controlled by one (1) 7.6 MMBtu per hour natural gas fired thermal oxidizer ("**North Oxidizer**") exhausting to one (1) stack identified as SP-5Y(N), including:

- (a) One (1) Mitsubishi heatset web offset lithographic printing press with ~~four (4)~~ **two (2)** units and two (2) webs identified as Press 268 with a maximum line speed of 1600 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment; and
- (b) One (1) Toshiba heatset web offset lithographic printing Press with four (4) units and two (2) webs identified as Press 269 with a maximum line speed of 1600 feet per minute and a maximum printing width of 50 inches, with associated in-line equipment.

A.2 and D.3 (South)

- (4) One (1) Mitsubishi heatset web offset lithographic printing press with four (4) units and ~~one (1)~~ **two (2)** webs identified as Press 262 with a maximum line speed of 1708 feet per minute and a maximum printing width of 61 inches, with associated in-line equipment, controlled by one (1) 1.894 MMBtu per hour natural gas fired thermal oxidizer ("**South Oxidizer**") exhausting to one (1) stack identified as SP-5N(S).
- (7) One (1) Mitsubishi heatset web offset lithographic printing press with four (4) units and ~~one (1)~~ **two (2)** webs identified as Press 273 with a maximum line speed of 1615 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment, exhausting to one (1) stack SP-5L(S).
- (13) One (1) Hantscho heatset web offset lithographic printing press with four (4) units and two (2) webs identified as Press 291 with a maximum line speed of 800 feet per minute and a maximum printing width of ~~267~~ **26** inches, with associated in-line equipment, exhausting to one (1) stack SP-5H(S).
- (17) One (1) Harris heatset web offset lithographic printing press with ~~four (4)~~ **two (2)** units and two (2) webs identified as Press 296 with a maximum line speed of 860 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5Q(S).

Comment 2:

B.10 Annual Compliance Certification-Condition B.10(c)(3)- We request that IDEM provide guidance and explanation as to what is meant by "whether compliance was continuous or intermittent". It is our interpretation that this information is already provided by the inclusion of the compliance status, Condition B.10(c)(2).

Response 2:

The purpose of the annual compliance certification is to provide a report of the compliance history of the source over the annual reporting period. The requirement to provide the compliance status is not clear, in that, this could be interpreted as a requirement to provide a snapshot of compliance at the time of the certification. The requirement to certify whether compliance was continuous or intermittent gets to the intent of the certification, stating the compliance status over the reporting period. This is more clearly defined in the federal Part 70 requirements for compliance certifications under 40 CFR 70.6(c)(5)(iii)(C):

"(C) The status of compliance with the terms and conditions of the permit for the period covered

by the certification, including whether compliance during the period was continuous or intermittent." . . .

As part of the annual compliance certification, the owner/operator should not simply state that the source is in or out of compliance. Rather, the owner/operator should state whether compliance was continuous or intermittent over the entire reporting period. There are no changes to the permit as a result of this comment.

Comment 3:

B.11 Preventive Maintenance Plan-Condition B.11(d)-A five year preventative maintenance record retention requirement is overly burdensome and unnecessary. This was a newly added requirement that was not contained in the preliminary draft permit for which Donnelley supplied comments. Preventive maintenance records should not be required to be retained since these documents are not the basis for determining whether there was a deviation or violation of the permit. This is also not an appropriate method for compliance monitoring. Furthermore, preventive maintenance is often performed without any record of this activity being created. It would be onerous to now require a permittee to prepare a written record of all preventive maintenance activities performed.

Response 3:

326 IAC 2-7-5(3)(B)(ii) requires records to be retained for five (5) years. Part (d) of this condition is consistent with condition C.19 General Record Keeping requirements based on the same rule. IDEM acknowledges that the preventive maintenance plan provision does not protect a source from violating any limitation on emissions or potential to emit, however it is necessary to insure that failure to implement PMP does not cause or contribute to a violation of any limitation on emissions or PTE. There has been no change to this condition as a result of this comment.

Comment 4:

B.15 Deviations from Permit Requirements and Conditions-We believe there is confusion created by the title of the specified report form, which was changed from the previous version of the draft Title V permit and has been re-titled "Quarterly Deviations and Compliance Monitoring Report". Condition B.15(b)(1) states that an excursion from compliance monitoring parameters is not a deviation unless tied to an applicable rule or limit. Therefore, it is misleading to include compliance monitoring in the title of the required report. We request that it be re-titled as "Quarterly Deviation Report". We also request that the section for reporting the "number of deviations" on the subject form be deleted since it is not consistent with the reporting of each deviation individually.

Response 4:

The initial version reviewed by the applicant required deviations to be reported in 10 days and a Compliance Monitoring report to be submitted semi-annually. IDEM is no longer requiring sources to report deviations in 10 days. 326 IAC 2-7-5(3)(c)(i) requires reports of Compliance Monitoring reporting of at least semi-annually. 326 IAC 2-7-5(3)(c)(i) requires reports of deviations. The Deviation reporting and compliance monitoring form were joined to require quarterly reporting. Emergencies will be reported on their own form. There are no changes to the permit as a result of this comment.

Comment 5:

B.22 Inspection and Entry-We request that this condition be modified to clarify that entry, access, inspection, sampling, and monitoring will only be conducted at reasonable times (i.e., normal business hours).

Response 5:

"At reasonable times" has been deleted because neither the rule nor the statute limit IDEM's access. Not all events (emergencies, noncompliance, public health risks, etc.) occur during "normal business hours". IDEM has the authority to access the facility, records, etc. during any time. There has been no change to this condition as a result of this comment.

Comment 6:

C.10 Compliance Requirements-We request that the language of the first sentence of this condition stating IDEM's right to require stack testing, monitoring, or reporting be narrowed to the regulatory intent: "The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements", should read "The commissioner may require stack testing, monitoring or reporting when necessary to determine if the facility is in compliance with all applicable requirements.

Response 6:

The permit language in the Title V is identical to the language listed in 326 IAC 2-1.1-11. If a Permittee believes that a performance test request by IDEM, OAQ, is unreasonable or without basis, an objection can be filed with the Office of Environmental Adjudication. There has been no change to this condition as a result of this comment.

Comment 7:

C.16 Compliance Monitoring Plan-Condition C.16(f)-This provision should be deleted and the original draft language regarding the 5% rule should be reinstated into the Deviation section at Condition B.15(b)(3). It is unreasonable to now require the Permittee to report each and every failure to make or record information required by the compliance monitoring provisions of Section D where the failure occurred with only 5% or less of the required data in a quarter. There is no reasonable justification or legal requirement for IDEM to require this type of onerous reporting.

Response 7:

The IDEM, OAQ has restructured C.16 to clarify the contents and implementation of the compliance response plan. The name of the condition has been changed to better reflect the contents of the condition. The language regarding the OAQ's discretion to excuse failure to perform monitoring under certain conditions has been deleted. The OAQ retains this discretion to excuse minor incidents of missing data; however, it is not necessary to state criteria regarding the exercise of that discretion in the permit. In (c)(2) "administrative amendment" has been revised to "minor permit modification," because 326 IAC 2-7-11(a)(7) has been repealed. Requests that do not involve significant changes to monitoring, reporting, or recordkeeping requirements may now be approved as minor permit modifications.

C.16 ~~Compliance Monitoring~~ **Response Plan - Failure to Take Response Steps Preparation, Implementation, Records, and Reports** [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to **prepare** ~~implement: a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:~~
- ~~(1) This condition;~~
 - ~~(2) The Compliance Determination Requirements in Section D of this permit;~~
 - ~~(3) The Compliance Monitoring Requirements in Section D of this permit;~~
 - ~~(4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and~~
 - ~~(5) A a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, and maintained on site, and is comprised of:~~
 - ~~(A)(1) Reasonable response steps that may be implemented in the event that compliance-related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.~~
 - ~~(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.~~
- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.**
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition **as follows:** ~~Failure to take reasonable response steps may constitute a violation of the permit.~~
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or**

- (2) **If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.**
 - (3) **If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.**
 - (4) **Failure to take reasonable response steps shall constitute a violation of the permit.**
- (c) ~~Upon investigation of a compliance monitoring excursion, the~~ **The Permittee is excused from taking** **not required to take any** further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment **and This shall be an excuse from taking further response steps providing that** prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for ~~an administrative amendment~~ **a minor permit modification** to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) **When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.**
- ~~(d)(e)~~ **(e) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. The Permittee shall record all instances when response steps are taken.** In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- ~~(e)(f)~~ **(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed at all times when the equipment emission unit is operating, except for time necessary to perform quality assurance and maintenance activities. If monitoring is required by Section D and the equipment**

~~is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.~~

- (f) ~~At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.~~

Comment 8:

C.20 General Reporting Requirements-Condition C.20(a)-Consistent with our comments on Condition B.15 above, we request that the required report form be re-titled as "Quarterly Deviation Report" and modified as noted above.

Response 8:

The Quarterly Deviation and Compliance Monitoring Report, now requires the Permittee to not only report that there were deviations, but to also include the probable cause and the response steps taken. IDEM is no longer requiring sources to report deviations in ten days, because the rules never specified 10 days, therefore every Permittee will need to submit this report quarterly to ensure continued compliance with the permit terms and conditions. All references to deviations were removed from the Emergency Occurrence Report. This report allows the 2 day notification to come in without the responsible official certification as long as emergencies are included in the Quarterly Deviation and Compliance Monitoring Report form, which is required to be certified by the responsible official. There are no changes to the permit as a result of this comment.

Comment 9:

D.1.1 Particulate Matter Limitation-Simplification of the source descriptions and elimination of the stack IDs is requested in this Condition for ease of reading and comprehension. In addition, the correct AP-42 emission factor for PM emissions from natural gas combustion is 7.6 pounds per million cubic feet.

Response 9:

The following changes have been made to the permit:

D.1.1 Particulate Matter Limitation (PM) [326 IAC 6-2-3]

Particulate limitations for Boilers #1(N) (SB-4A(N)), Boiler #2(N) (SB-4B(N)), Boiler #3(N) (SB-4C(N)), Boiler #4(N) (SB-4D(N)), Boiler #5(N) (SB-4E(N)), Boiler #1(S) (SB-4A(S)), Boiler #2(S) (SB-4B(S)) and Boiler #3(S) (SB-4C) shall be 0.3315 pound particulate matter per MMBtu. Compliance with this limitation is confirmed based on the total PM emission factor for natural gas fired boilers as found in Table 1.4-2 of Supplemental D, March 1998, to the 5th Edition of AP-42, January 1995, of ~~7.5~~ **7.6** pounds per million cubic feet of gas burned.

This limitation is based on the following equation:

$$P_t = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

where

C = 50 u/m³

Pt = emission rate limit (lbs/MMBtu)

Q = total source heat input capacity (MMBtu/hr)

N = number of stacks

a = plume rise factor (0.67)

h = stack height (ft)

Comment 10:

D.1.2 Sulfur Dioxide-Simplification of the source descriptions and elimination of the stack IDs is requested in this Condition for ease of reading and comprehension. Alternatively, since 326 IAC 7-1.1-1 no longer applies to these boilers, it is suggested that this condition be eliminated entirely.

Response 10:

This condition is from a previous construction permit and has been noted in the TSD as non-applicable, however, it is only non-applicable if "only natural gas and propane are used," therefore, the conditions has been changed as follows:

D.1.2 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1]

Sulfur content limits for Boiler #1(N) (~~SB-4A(N)~~), Boiler #2(N) (~~SB-4B(N)~~), Boiler #3(N) (~~SB-4C(N)~~), Boiler #4(N) (~~SB-4D(N)~~), Boiler #5(N) (~~SB-4E(N)~~), Boiler #1(S) (~~SB-4A(S)~~), Boiler #2(S) (~~SB-4B(S)~~) and Boiler #3(S) (~~SB-4C(S)~~) are not longer applicable, because they are not capable of burning #2 fuel oil **and burn only natural gas and propane and the SO₂ PTE is less than 25 tpy.**

Comment 11:

D.1.3 Preventive Maintenance Plan-Since the boilers have no control devices, the final portion of this condition - "and its control device" - should be deleted.

Response 11:

The following changes have been made to the permit:

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility. ~~and its control device.~~

Comment 12:

D.1.4 Reporting Requirements-The reporting requirements of this condition, and the Natural Gas Fired Boiler Certification form should be deleted from the permit since natural gas (primary fuel) and propane (backup fuel) are explicitly allowed in the permit. The facility will not be burning any "alternative" fuels. Therefore, this requirement serves no compliance purpose. The Annual Emission Statement will provide sufficient and effective reporting of actual usage and emissions.

Response 12:

The Natural Gas Fired Boiler Certification is applicable even when natural gas is the only fuel and the boiler is equal to or greater than 10 MMBtu/hr, in order to insure compliance with D.1.3 and visible emissions. Rather than requiring visible emission notations, a report is required verifying that only natural gas and no alternate fuels were combusted in the boiler. There are no changes to the permit as a result of this comment.

Comment 13:

D.2.1 Particulate Matter-Simplification of the source descriptions and elimination of the stack IDs is requested in this Condition for ease of reading and comprehension.

Response 13:

The following changes have been made to the permit:

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Particulate emission limitations for Paper Trim Cyclones #1(N) (SBP-5H(N)), Paper Trim Cyclone #2(N) (SBP-5I(N)), Paper Trim Cyclone #3(N) (SBP-5J(N)), Trim Cyclone #4(N) (SBP-5K(N)), Paper Trim Cyclone #1(S) (SBP-5E(S)), Paper Trim Cyclone #2(S) (SBP-5E(S)), Paper Trim Cyclone #3(S) (SBP-5E(S)) and Paper Trim Cyclone #4(S) (SBP-5E(S)) shall be 10.4 pounds per hour per cyclone, **established as E in the following formula:**

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

**where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour.**

The Permittee shall demonstrate compliance with this limit based on an emission factor of one pound of dust emitted per ton of paper handled,

Particulate emission limitation for Dust Collectors #1(N) (SD-6A(N)), Dust Collector #2(N) (SD-6B(N)), Dust Collector #3(N) (SD-6C(N)), Dust Collector #1(S) (SD-6A(S)) and Dust Collector #2(S) (SD-6B(S)) shall be 0.551 pound per hour per Dust Collector which shall be achieved by the use of baghouse pollution control devices **in accordance with Section C.1-Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour 326 IAC 6-3-2(c).**

Comment 14:

D.2.8 - Record Keeping Requirements

D.2.8(a) should be revised to require visible emissions notations only when venting to atmosphere, consistent with Condition D.2.4.

D.2.8(b) should be revised to require only record keeping of the static pressure readings as required by Condition D.2.5. The remaining requirements of this condition - D.2.8(b)(1)(B) through D.2.8(b)(8) should be deleted in their entirety because maintaining these records is not applicable or relevant to documenting compliance with referenced Condition D.2.5, requiring a

record of the static pressure drop. The requirement to maintain this type of detail is unreasonable, unsupported by regulation, and far exceeds the scope of the Part 70 operating permits. Quality Assurance and Quality Control procedures are not defined anywhere in the permit or in the rules and these words have a very different meaning in the industrial world than in the regulatory world. The only possible QC procedure related to parametric monitoring is the calibration of the pressure gauge instrumentation, which is already required in Condition D.2.5. Please note that this request has been honored for other sources in Indiana during negotiations for Title V permits under appeal.

Response 14:

IDEM OAQ agrees, but notes that operations which vent inside of buildings are considered emissions, and enter the atmosphere through doors, windows and general ventilation of the building. The following changes have been made to the permit as a result of comment and OAQ model changes:

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the baghouse stack exhausts **when venting to the atmosphere.**
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain weekly records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle **operation: frequency and differential pressure**
- ~~(2) Documentation of all response steps implemented, per event.~~
- ~~(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.~~
- ~~(4) Quality Assurance/Quality Control (QA/QC) procedures.~~
- ~~(5) Operator standard operating procedures (SOP).~~
- ~~(6) Manufacturer's specifications or its equivalent.~~
- ~~(7) Equipment "troubleshooting" contingency plan.~~
- ~~(8) Documentation of the dates vents are redirected.~~
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 15:

D.3 - Facility Description-As noted above for Condition A.2, the descriptions of presses 269 [North Plant - D.3(6)(b)], 262 [South Plant - D.3(4)], 273 [South Plant - D.3(7)], 291 [South Plant - D.3(13)], and 296 [South Plant - D.3(17)] have been revised to reflect the correct web width and

number of webs and units. In addition, a distinction between the pollution control devices at the North and South Plants has been added.

Response 15:

Changes have been made to the D.3 Facility Description box to reflect the changes in comment 2.

Comment 16:

- (A) D.3.1 Volatile Organic Compounds-The VOC emissions formula in Conditions D.3.1(a) and (b) should be revised to reflect the accepted shop towel retention factor for cleaning solvent of 50%, per USEPA's Alternative Control Techniques Document: Offset Lithographic Printing (EPA 453/R-94 054, June 1994).
- (B) In Condition D.3.1(d), the control requirements for presses 268 and 269 (controlled by the north plant oxidizer) and press 262 (controlled by the south plant oxidizer) need to be clarified to state that the oxidizers be in operation only when the presses they control are in operation. As currently worded, this condition could be read to mean that both oxidizers must be in operation when any of these three presses are running, even though they would not be controlling VOC emission.

Response 16:

The following changes have been made to the permit as a result of comment (A):

VOC emissions (tpy)= (ink usage X volatile content X 80% flash off)+ (fountain solution usage X volatile content X 100% flash off) + (cleaner usage X volatile content X ~~100%~~50% flash off)

D.3.3 Clean-up Solvent VOC Control

The VOC flash off for clean-up solvent is 100%. As derived from "USEPA's Alternative Control Techniques Document: Offset Lithographic Printing (EPA 453/R-94 054, June 1994), the accepted shop towel retention factor for clean-up solvent is 50%. A 50% reduction in flash off shall be used in VOC emissions formula in D.3.1 as an emission control technique and shall meet the following conditions:

- (a) The clean-up solvent shall have a VOC content of thirty percent (30%) or less, by weight, or a composite vapor pressure less than or equal to ten (10) millimeters of mercury (Hg) at twenty degrees Celsius (20° C); and
- (b) The clean-up solvents shall be kept in tightly covered tanks or containers during transport and storage; and
- (c) The cleaning cloths used with the clean-up solvents shall be placed in tightly closed containers when not in use and while awaiting off-site transport. The cleaning cloths shall be properly cleaned and disposed.

The following changes have been made to the permit as a result of comment (B):

- (d) Presses GFP-268 and GFP-269 will be controlled by **the North Oxidizer**, a 7.6 MMBtu

per hr thermal oxidizer, and Press GRM-262 will be controlled by the **South Oxidizer**, a 1.894 MMBtu per hr thermal oxidizer. The thermal oxidizers shall be in operation at all times during which any of ~~these~~ the printing presses **controlled by the oxidizers** are in operation. Pursuant to CP 107-2726 issued on February 26, 1993 and CP 107-2917 issued on April 6, 1993 the controls of the press, dryer and thermal afterburner for Presses GPP-268 and GPP-269 shall be interlocked such that the press and dryer cannot be operated until such time that the combustion temperature in the thermal afterburner has attained the minimum temperature determined in testing requirements to destroy at least 90% of captured VOC.

The requirements from CP 107-2726 issued on February 26, 1993 and CP 107-2917 issued on April 6, 1993, conditions #5, #7, #8, # 9 and CP 107-2478 issued on June 17, 1992 conditions #4, and #5, were removed and have been replaced with new requirements, in order to regulate all thermal oxidizer within the entire facility on the same parameters, monitoring and reporting schedule to maintain compliance with 326 IAC 8-1-6 (BACT) .

Additionally the sections have been renumbered as a result of this change

Comment 17:

D.3.7(Now D.3.8) Testing Requirements-The stack testing requirements should be revised to require only the operating temperature necessary to achieve the 90% minimum required VOC destruction efficiency. Fan amperage, and duct velocity are not critical elements for establishing compliance and should be eliminated from this condition. Capture efficiency testing is not required for heatset lithographic printing per guidance from USEPA. Emissions from the controlled operation of the presses at this facility will be based on the 90% required minimum control efficiency of the thermal oxidizer systems and the capture and retention factors for ink, fountain solution, and cleaning solvent found in USEPA Guidance Series: Control of Volatile Organic Emissions from Offset Lithographic Printing (Draft, September 1993) and USEPA's Alternative Control Techniques Document: Offset Lithographic Printing (EPA 453/R-94 054, June 1994), as included in our Title V permit application.

Response 17:

Monitoring of the fan amperage or duct velocity is necessary to ensure that the system is operating properly. Temperature and gas flow operating parameters provides an indication to ensure that the oxidizer achieves the required destruction efficiency. IDEM OAQ agrees that capture efficiency is not necessary for the heatset lithographic printing. Additionally the test frequency in accordance with IDEM OAQ guidance has been changed to every two and one half years. A unit which in its most recent test that has demonstrated actual emissions to be less than 50% of the applicable limit may petition for skipping one test cycle. The Permittee should submit a request to IDEM no later than 360 days prior to the due date of the test, requesting an exemption from the current permit cycle test. D.3.8 has been changed as follows:

D.3.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Compliance stack tests shall be performed on the thermal oxidizers to determine the ~~capture efficiency~~, operating temperature **and** fan amperage or duct velocity at 90% minimum destruction of VOC within 180 days of issuance of this permit. These tests shall be repeated once every ~~five (5)~~ **two and one (2 1/2)** years. These tests shall be performed using methods approved by the OAQ. The OAQ shall be notified of the actual test date at least two weeks prior

to the date, a test protocol shall be submitted to the OAQ, Compliance Data Section, 35 days in advance of the test, and all test reports must be received by the OAQ within 45 days of the completion of the testing.

Comment 18:

D.3.9(Now D.3.10) Thermal Oxidizer-Consistent with our comments on Condition D.3.1(d) above, the language relating to thermal oxidizer operation need to be modified to clarify the requirement. Also, consistent with our comments on Condition D.3.7, the words "fan amperage or duct velocity" should be deleted. We also request that the minimum temperature of the thermal oxidizer in this condition be revised to 1350EF, consistent with the permit requirements of CP 107-2478 for press 262, rather than the 1400EF temperature shown in the draft Title V permit. There is no regulatory or permit basis for including this higher temperature in the permit.

Response 18:

The following changes have been made to the permit:

D.3.10 Thermal Oxidizer

- (a) ~~The thermal oxidizers~~ **North Oxidizer** shall operate at all times that ~~any one either~~ of the Presses; ~~Press 268 or Press 269 or Press 262 are in operation~~ **operating. The South Oxidizer shall operate at all times that Press 262 is in operation.** When operating, the thermal oxidizers shall maintain a minimum operating temperature of ~~1400°F~~ 1350° or the temperature **and** fan amperage or duct velocity determined at the stack tests that achieves a minimum 90% destruction efficiency of the VOC.

See also comment 17.

Comment 19:

D.3.10(b) Parametric Monitoring-This section should be deleted in accordance with our previous comments on Conditions D.3.7 and D.3.9.

Response 19:

See Comment 17 and 18.

Comment 20:

D.3.11(Now D.3.12) Particulate Matter Monitoring-This Condition should be revised consistent with the language in all other Part 70 permits containing this type of requirement to specify "weekly observations shall be made of the overspray while in operation and monthly inspections of the emissions from the stacks and presence of overspray on the nearby ground, weather permitting".

Response 20:

As a result of this comment, the following changes have been made to the permit:

D.3.12 Particulate Matter Monitoring

- (a) Pursuant to CP 107-2853 daily inspection from the in-line Stainer Press 192 shall be

performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while in operation. ~~of the following:~~ **The Compliance Response Plan for this unit shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.**

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. **During periods of inclement weather, these inspections shall be performed as weather permits.** The Compliance Response Plan for this unit **shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.**
- a) ~~not visibly detectable at the exhaust,~~
- b) ~~not accumulated on the rooftops or on the ground, or~~
- c) ~~not causing any nuisance problems.~~

~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.~~

- (c) **Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.**

Comment 21:

D.3.12 (Now D.3.13) Record Keeping Requirements-The requirements in Condition D.3.12(a) should be modified to clarify for which materials usage and VOC content is required; to allow for alternate documentation of this information other than purchase orders, invoices, and MSDS; to eliminate the date of usage requirement; and to eliminate a duplicate reference to cleanup solvent usage. Material usages will be compiled monthly based on purchasing, inventory, or other records for all materials consumed during the month. It is not possible to record specific dates for materials usage, nor is this information necessary for demonstrating compliance with the monthly permit limits. Requiring records of the dates of usage is overburdensome and does not improve the quality of the records needed to document compliance.

D.3.12(c), the phrase "and weekly records of the duct pressure or fan amperage" should be deleted consistent with our previous comments.

Response 21:

As a result of this comment, the following changes have been made to the permit:

D.3.123Record Keeping Requirements

- (a) To document compliance with **Conditions D.3.1, D.3.2 and D.3.3**, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1)

through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in **Conditions D.3.1, D.3.2 and D.3.3.**

- (1) The amount and VOC content of each **ink, fountain solution**, coating material and solvent used. Records shall include purchase orders, invoices, ~~and~~ material safety data sheets (MSDS) **and other documentation** necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings **and ink** and those used as cleanup solvents;
- ~~(2) — A log of the dates of use;~~
- ~~(3)~~(2) The volume weighted VOC content of the coatings used for each month;
- ~~(4)~~(3) The cleanup solvent usage for each month;
- ~~(5)~~(4) The total VOC usage for each month; and
- ~~(6)~~(5) The weight of VOCs emitted for each compliance period.
- (6) The VOC content of the used shop towels.**

See comment 17, regarding thermal oxidizer .

Comment 22:

Quarterly Deviation and Compliance Monitoring Report-As noted in or comments on Condition B.15, we request that the required report form be re-titled as "Quarterly Deviation Report" and modified as noted above.

Response 22:

The form now requires the source to not only report that there were deviations, but to also include the probable cause and the response steps taken. IDEM is no longer requiring sources to report deviations in ten days, therefore every source will need to submit this report quarterly. No change has been made to the permit as a result of this comment.

Comment 23:

In addition to various comments regarding TSD to correct typographical and editorial errors, and incorporate changes requested within the permit.

The potential to emit for press 240 submitted with the Title V permit application was 5.55 pounds per hour or 24.3 tons per year, not more than 25 tons per year as stated in the TSD. A revision to the language has been indicated clarifying this point. In addition, as noted in our comments on the draft Title V permit, the VOC emissions formula has been revised to reflect the accepted shop towel retention factor for cleaning solvent of 50%.

Response 23:

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Applicability is before controls, and the calculated PTE for Press 240 before controls was greater than 25 tpy, thus why a limit of less than 25 tpy was established in order to avoid applicability of 8-1-6. Credit for retention in cleaning rags is a control.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

Change 1:

On January 1, 2000, the IDEM Office of Air Management changed its name to the Office of Air Quality. Therefore, all references to the Office of Air Management (OAM) have been changed to the Office of Air Quality (OAQ).

Change 2:

Corrections to capitalization, spelling and miscellaneous errors were corrected. Also sections renumbered after insertion or deletion.

Change 3:

During final review process of this permit by OAQ, it was discovered that Press 254 was never permitted. It should have been listed in the Unpermitted Emission Units and Pollution Control Equipment found in the Technical Support Document.

- (1) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit.
- (2) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Change 4:

Paper Dust Cyclones has been changed to Dust Collectors, to reflect the same unit name as in Section A.2 and description box.

D.2.3 Particulate Matter (PM)

The baghouses for PM control shall be in operation and control emissions from the Paper Dust Collectors at all times that the ~~Paper Dust Cyclones~~ **Collectors** are in operation.

Change 5:

Paper Dust Cyclones has been changed to Dust Collectors, to reflect the same unit name as in Section A.2 and description box, also the Parametric Monitoring conditions have been revised to

establish normal operating conditions for the emission unit or control device and to require implementation of the compliance response plan when monitoring indicates operation is outside the normal range.

D.2.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the ~~Paper Dust Cyclones~~ **Collectors**, at least once weekly when the Paper Dust Cyclones **Collectors** are in operation when venting to the atmosphere. ~~Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.~~ **When for any one reading, the pressure drop across the scrubber is outside the normal range of 3.0 to 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. A reading that is outside the ranges is not a deviation from this permit.**

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.2.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the Paper Dust Cyclones **Collectors** when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

Change 6:

Incorrect Particulate Matter (PM) formula from 326 IAC 6-3 applied. Correction as follows:

D.3.5 Particulate Matter (PM) [326 IAC 6-3]

The PM from Stainer 192 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

~~Extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:~~

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Change 7:

B.12 Emergency Provisions (a)(b) and (g) have been revised to reflect rule changes to 326 IAC 2-7-16. This section of the rule is now consistent with 40 CFR 70.6(g) and provides an affirmative defense to an action brought for non-compliance with technology based emission limitations only.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation; ~~except as provided in 326 IAC 2-7-16:~~
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a ~~health-based or~~ technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (g) ~~Operations may continue during an emergency only if the following conditions are met:~~
 - (4) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) ~~If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:~~
 - (A) ~~The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and~~
 - (B) ~~Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.~~

~~Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.~~

Change 8:

B.14 Multiple Exceedances has been deleted, because 326 IAC 2-7-5(1)(E) has been repealed, because it conflicted with 40 CFR 70.6(a)(6).

~~B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]~~

~~Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.~~

Change 9:

B.14 Prior Permits Superseded was added to the permit to implement the intent of the new rule 326 IAC 2-1.1-9.5.

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

Change 10:

Remove (b) from B.13 Permit Shield. Since B.14 Prior Permits Superseded has been added to the permit, it is not necessary for this statement to be in this condition. The numbering has also been corrected accordingly.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

~~(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.~~

Change 11:

B.8 Compliance with Permit Conditions has been revised to clarify that noncompliance with any requirement of this permit may result in an enforcement action against the permittee, an action to modify, revoke, reissue or terminate the source's permit, and/or a denial of the permittee's application to renew the permit. In addition, except for those permit conditions that are not federally enforceable, noncompliance is also a violation of the federal Clean Air Act.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit ~~except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and~~ is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) Noncompliance with any provisions of this permit, except any provision

specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.

- (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

Change 12:

Prompt Reporting of Deviations: EPA made it clear that there can not be a requirement to do something in a permit, then say that it's not a deviation when the source does not do it [see 40 CFR 70.6(a)(6)(i)]. We may use enforcement discretion in these cases, but we can not create as exemption through the TV permit. We revised Parametric Monitoring (and all other parametric monitoring conditions) to clarify the facility specific events that would not qualify as a deviation.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. ~~Deviations that are required to be reported by an applicable requirement~~ **A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit,** shall be reported according to the schedule stated in the applicable requirement and ~~do~~ **does** not need to be included in this report.

~~The notification by the Permittee~~ **Quarterly Deviation and Compliance Monitoring Report** does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit ~~or a rule. It does not include:~~
 - (1) ~~An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~
 - (2) ~~Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

Change 13:

Condition B.20 (Operational Flexibility) has been changed to clarify the reason a certification is not required.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification which shall be submitted by the Permittee does not require the certification by the responsible official as defined by 326 IAC 2-7-1(34).

Change 14:

Changed to clarify C.8 (d) so that the Permittee understands that the asbestos notification should be certified by the owner or operator and not the responsible official. C.8(f) has been revised to clarify the enforceability of accreditation. the requirement that the inspector be accredited is a provision of 40 CFR 61, Subpart M. Therefore, the following revision has been made to clarify what is federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, **pursuant to the provisions of 40 CFR 61, Subpart M**, is federally enforceable.

Change 15:

IDEM, OAQ has revised C.17 Actions Related to Noncompliance Demonstrated by a Stack Test; a certification by the responsible official is required for the notification sent in response to non-compliance with a stack test.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do **not** require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: R.R. Donnelley & Sons Company
Source Location: 1009 Sloan Street, Crawfordsville, Indiana 47933-2741
County: Montgomery
SIC Code: 2732
Operation Permit No.: T107-5963-00052
Permit Reviewer: Teresa L. Freeman

The Office of Air Management (OAM) has reviewed a Part 70 permit application from R.R. Donnelley & Sons Company relating to a book printing and binding operation.

Source Definition

This book printing and binding company consists of two (2) plants:

- (a) North Plant is located at 1009 Sloan St., Crawfordsville, IN; and
- (b) South Plant is located at State Road 32 West, Crawfordsville, IN.

Since the two (2) plants are located adjacent to each other, separated by a public road and a railroad right of way, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

On October 13, 1997, a Review Request (RR-107-8861-00052) was issued designating the North Plant (107-00010) and the South Plant (107-00011) as one source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

North Plant:

- (1) Four (4) natural gas or propane fired boilers, with a maximum rating of 20.9 MMBtu (million British thermal units) per hour each:
 - (a) Boiler #1(N) installed in 1956 with emissions exhausting through stack SB-4A(N).
 - (b) Boiler #2(N) installed in 1956 with emissions exhausting through stack SB-4B(N).
 - (c) Boiler #3(N) installed in 1962 with emissions exhausting through stack SB-4C(N).
 - (d) Boiler #4(N) installed in 1972 with emissions exhausting through stack SB-4D(N).
- (2) One (1) natural gas or propane fired boiler, with a maximum rating of 2.56 MMBtu (million British thermal units) per hour: Boiler #5(N) installed in 1975 with emissions exhausting through stack SB-4E(N).

- (3) Four (4) Paper Trim Cyclones:
 - (a) Paper Trim Cyclone #1(N) emissions exhausting through stack SBP-5H(N), installed in 1973.
 - (b) Paper Trim Cyclone #2(N) emissions exhausting through stack SBP-5I(N), installed in 1973.
 - (c) Paper Trim Cyclone #3(N) emissions exhausting through stack SBP-5J(N), installed in 1973.
 - (d) Paper Trim Cyclone #4(N) emissions exhausting through stack SBP-5K(N), installed in 1988.
- (4) Three (3) Paper Dust Collectors:
 - (a) Dust Collector #1(N) consists of a cyclone followed by a baghouse for particulate control and is exhausted through SD-6A(N) and was installed in 1973.
 - (b) Dust Collector #2(N) consists of a Baghouse for particulate control and is exhausted through SD-6B(N) and was installed in 1973.
 - (c) Dust Collector #3(N) consists of a cyclone and followed by two (2) baghouses for particulate control and is exhausted through SD-6C(N) and was installed in 1973.
- (5) One (1) In-line book stainer (spray booth) identified as stainer 192 used for edge staining paper using low pressure-high volume spray coating and using dry filters for overspray control and exhausting through stack BS-4X(N). Installed in 1993.
- (6) Two (2) heat set web offset lithographic printing presses, controlled by one (1) 7.6 MMBtu per hour natural gas fired thermal oxidizer exhausting to one (1) stack identified as SP-5Y(N), installed in 1993 and including:
 - (a) One (1) Mitsubishi heat set web offset lithographic printing press with four (4) units and two (2) webs identified as press 268 with a maximum line speed of 1600 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment; and
 - (b) One (1) Toshiba heat set web offset lithographic printing press with four (4) units and two (2) webs identified as press 269 with a maximum line speed of 1600 feet per minute and a maximum printing width of 50 inches, with associated In-line equipment.
- (7) One (1) Hantscho heat set web offset lithographic printing press with two (2) units and two (2) webs identified as press 240 with a maximum line speed of 1000 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5R(N). Installed in 1989.
- (8) One (1) KBA Compacta heat set web offset lithographic printing press with two (2) units and two (2) webs identified as press 241 with a maximum line speed of 1100 feet per minute and a maximum printing width of 26 inches, with associated in-line equipment, exhausting to one (1) stack SP-5S(N). Installed in 1982.
- (9) One (1) Hantscho heat set web offset lithographic printing press with four (4) units and two (2) webs identified as press 245 with a maximum line speed of 1000 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5Q(N). Installed in 1989.

- (10) One (1) Timson heat set web offset lithographic printing press with one (1) unit and one (1) web identified as press 242 with a maximum line speed of 1200 feet per minute and a maximum printing width of 47 inches, with associated in-line equipment, exhausting to one (1) stack SP-5Z(N). Installed in 1995.
- (11) One (1) Timson heat set web offset lithographic printing press with one (1) units and one (1) webs identified as press 243 with a maximum line speed of 1200 feet per minute and a maximum printing width of 47 inches, with associated in-line equipment, exhausting to one (1) stack SP-5AA(N). Installed in 1995.
- (12) One (1) Harris heat set web offset lithographic printing press with two (2) units and two (2) webs identified as press 285 with a maximum line speed of 825 feet per minute and a maximum printing width of 26 inches, with associated in-line equipment, exhausting to one (1) stack SP-5K(N). Installed in 1976.
- (13) One (1) Harris heat set web offset lithographic printing press with two (2) units and two (2) webs identified as press 286 with a maximum line speed of 825 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5L(N). Installed in 1979.
- (14) One (1) Harris heat set web offset lithographic printing press with four (4) units and two (2) webs identified as press 287 with a maximum line speed of 825 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5M(N). Installed in 1979.
- (15) One (1) Harris heat set web offset lithographic printing press with four (4) units and two (2) webs identified as press 288 with a maximum line speed of 825 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5N(N). Installed in 1979.
- (16) One (1) Harris heat set web offset lithographic printing press with four (4) units and two (2) webs identified as press 289 with a maximum line speed of 825 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5O(N). Installed in 1984.
- (17) Four (4) UV sheetfed offset lithographic presses:
 - (a) One (1) Heidelberg UV sheetfed offset lithographic press identified as press 232 with a maximum line speed of 317 feet per minute and a maximum printing width of 25.5 inches including five (5) units and coater, exhausting to one (1) stack SP-5U(N) used as cooling air for UV lamps. Installed in 1991.
 - (b) One (1) Heidelberg UV sheetfed offset lithographic press identified as press 233 with a maximum line speed of 317 feet per minute and a maximum printing width of 25.5 inches including five (5) units and coater, exhausting to one (1) stack SP-5U(N) used as cooling air for UV lamps. Installed in 1991.
 - (c) One (1) Heidelberg UV sheetfed offset lithographic press identified as press 238 with a maximum line speed of 434 feet per minute and a maximum printing width of 40 inches including six (6) units and coater, exhausting to one (1) stack SP-5V(N) used as cooling air for UV lamps. Installed in 1990.
 - (d) One (1) Heidelberg UV sheetfed offset lithographic press identified as press 239 with a maximum line speed of 473 feet per minute and a maximum printing width of 40 inches including two (2) units and coater, exhausting to one (1) stack SP-5W(N) used as cooling air for UV lamps. Installed in 1992.
- (18) One (1) conventional sheetfed offset lithographic press identified as press 254 with a

maximum line speed of 299 feet per minute and a maximum printing width of 60 inches.
Installed in 1967.

South Plant:

- (1) Three (3) natural gas or propane fired boilers, with a maximum rating of 25.1 MMBtu (million British thermal units) per hour each:
 - (a) Boiler #1(S) installed in 1964 with emissions exhausting through stack SB-4A(S).
 - (b) Boiler #2(S) installed in 1964 with emissions exhausting through stack SB-4B(S).
 - (c) Boiler #3(S) installed in 1975 with emissions exhausting through stack SB-4C(S).
- (2) Four (4) Paper Trim Cyclones:
 - (a) Paper Trim Cyclone #1(S) emissions exhausting through stack SBP-5E(S), installed in 1976.
 - (b) Paper Trim Cyclone #2(S) emissions exhausting through stack SBP-5E(S), installed in 1976.
 - (c) Paper Trim Cyclone #3(S) emissions exhausting through stack SBP-5E(S), installed in 1976.
 - (d) Paper Trim Cyclone #4(S) emissions exhausting through stack SBP-5E(S), installed in 1976.
- (3) Two (2) Paper Dust Collectors:
 - (a) Dust Collector #1(S) consists of a cyclone followed by two (2) baghouses for particulate control and is exhausted through SD-6A(S) and was installed in 1976.
 - (b) Dust Collector #2(S) consists of a Baghouse for particulate control and is exhausted through SD-6B(S) and was installed in 1976.
- (4) One (1) Mitsubishi heat set web offset lithographic printing press with four (4) units and one (1) webs identified as press 262 with a maximum line speed of 1708 feet per minute and a maximum printing width of 61 inches, with associated in-line equipment, controlled by one (1) 1.894 MMBtu per hour natural gas fired thermal oxidizer exhausting to one (1) stack identified as SP-5N(S), installed in 1992.
- (5) One (1) Hantscho heat set web offset lithographic printing press with four (4) units and two (2) webs identified as press 270 with a maximum line speed of 807 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to SP-5F(S). Installed in 1979.
- (6) One (1) Cottrell heat set web offset lithographic printing press with four (4) units and two (2) webs identified as press 272 with a maximum line speed of 1000 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment, exhausting to one (1) stack SP-5D(S). Installed in 1973.
- (7) One (1) Mitsubishi heat set web offset lithographic printing press with four (4) units and one (1) webs identified as press 273 with a maximum line speed of 1615 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment, exhausting to one (1) stack SP-5L(S). Installed in 1991.
- (8) One (1) Cottrell heat set web offset lithographic printing press with four (4) units and two

- (2) webs identified as press 274 with a maximum line speed of 1000 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment, exhausting to one (1) stack SP-5C(S). Installed in 1973.
- (9) One (1) Cottrell heat set web offset lithographic printing press with four (4) units and two (2) webs identified as press 276 with a maximum line speed of 1200 feet per minute and a maximum printing width of 64 inches, with associated in-line equipment, exhausting to one (1) stack SP-5E(S). Installed in 1976.
- (10) One (1) Toshiba heat set web offset lithographic printing press with four (4) units and one (1) web identified as press 260 with a maximum line speed of 1615 feet per minute and a maximum printing width of 36 inches, with associated in-line equipment, exhausting to one (1) stack SP-5I(S). Installed in 1986.
- (11) One (1) Toshiba heat set web offset lithographic printing press with four (4) units and one (1) web identified as press 261 with a maximum line speed of 1500 feet per minute and a maximum printing width of 36 inches, with associated in-line equipment, exhausting to one (1) stack SP-5J(S). Installed in 1987.
- (12) One (1) Hantscho heat set web offset lithographic printing press with one (1) unit and one (1) web identified as press 290 with a maximum line speed of 800 feet per minute and a maximum printing width of 26 inches, with associated in-line equipment, exhausting to one (1) stack SP-5G(S). Installed in 1984.
- (13) One (1) Hantscho heat set web offset lithographic printing press with four (4) units and two (2) webs identified as press 291 with a maximum line speed of 800 feet per minute and a maximum printing width of 267 inches, with associated in-line equipment, exhausting to one (1) stack SP-5H(S). Installed in 1984.
- (14) One (1) Hantscho heat set web offset lithographic printing press with four (4) units and two (2) webs identified as press 293 with a maximum line speed of 1000 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5K(S). Installed in 1989.
- (15) One (1) Hantscho heat set web offset lithographic printing press with four (4) units and two (2) webs identified as press 294 with a maximum line speed of 1076 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5M(S). Installed in 1991.
- (16) One (1) Hantscho heat set web offset lithographic printing press with two (2) units and two (2) webs identified as press 295 with a maximum line speed of 1000 feet per minute and a maximum printing width of 33 inches, with associated in-line equipment, exhausting to one (1) stack SP-5P(S). Installed in 1993.
- (17) One (1) Harris heat set web offset lithographic printing press with four (4) units and two (2) webs identified as press 296 with a maximum line speed of 860 feet per minute and a maximum printing width of 31 inches, with associated in-line equipment, exhausting to one (1) stack SP-5Q(S). Installed in 1994.
- (18) One (1) Heidelberg sheetfed offset lithographic press identified as press 258 with a maximum line speed of 505 feet per minute and a maximum printing width of 40.5 inches including six (6) units and coater, exhausting to one (1) stack SP-5R(S) used as cooling air for electric heaters. Installed in 1995.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

North Plant:

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (2) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
- (3) Combustion source flame safety purging on startup.
- (4) The following VOC and HAP storage containers:
 - (a) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
 - (b) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (5) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (6) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (7) Closed loop heating and cooling systems.
- (8) Exposure chambers ("towers", "columns"), for curing of ultraviolet coatings where heat is the intended discharge.
- (9) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs.
- (10) Water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs.
- (11) Noncontact cooling tower systems with either of the following:
 - (a) Forced and induced draft cooling tower system not regulated under a NESHAP.
- (12) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (13) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (14) Asbestos abatement projects regulated by 326 IAC 14-10.
- (15) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (16) Other activities of categories not previously identified:

Insignificant Thresholds: Activities with emissions equal to or less than thresholds require listing only
Lead (Pb) = 0.6ton/year or 3.29 lbs/day Carbon Monoxide (CO) = 25 lbs/day
Sulfur Dioxide (SO₂) = 5 lbs/hour or 25 lbs/day Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day

Nitrogen Oxides (NOx) = 5 lbs/hour or 25 lbs/day

Volatile Organic Compounds = 3 lbs/hour or 15
lbs/day

- (a) Glue and hot melt applications-No VOC listed in materials; less than 15 lb/day
- (b) Vacuum pumps-used to grip thin paper sheets for movement

South Plant:

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (2) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
- (3) Combustion source flame safety purging on startup.
- (4) The following VOC and HAP storage containers:
 - (a) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
 - (b) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (5) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (6) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (7) Closed loop heating and cooling systems.
- (8) Infrared cure equipment.
- (9) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs.
- (10) Water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs.
- (11) Noncontact cooling tower systems with either of the following:
 - (a) Forced and induced draft cooling tower system not regulated under a NESHAP.
- (12) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (13) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (14) Asbestos abatement projects regulated by 326 IAC 14-10.
- (15) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (16) Other activities of categories not previously identified:

Insignificant Thresholds: Activities with emissions equal to or less than thresholds require listing only
Lead (Pb) = 0.6ton/year or 3.29 lbs/day Carbon Monoxide (CO) = 25 lbs/day
Sulfur Dioxide (SO₂) = 5 lbs/hour or 25 lbs/day Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day
Nitrogen Oxides (NO_x) = 5 lbs/hour or 25 lbs/day Volatile Organic Compounds = 3 lbs/hour or 15 lbs/day

- (a) Glue and hot melt applications-No VOC listed in materials; less than 15 lb/day
- (b) Vacuum pumps-used to grip thin paper sheets for movement

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

North Plant:

- (a) PC (54) 1257, issued on July 11, 1978;
- (b) PC (34) 1285, issued on September 6, 1978.
- (c) Registered Operation letter, December 3, 1979
- (d) Registered Construction and Operation letter, June 19, 1988
- (e) Construction Permit PC (54) 1746, May 3, 1989
- (f) Operation Permit 54-06-93-0167, July 18, 1989
- (g) Operation Permit 54-11-93-0139, November 8, 1989
- (h) Operation Permit 54-11-93-0140, November 8, 1989
- (i) Operation Permit 54-11-93-0141, November 8, 1989
- (j) Registered Construction and Operation letter, January 4, 1990
- (k) Registered Construction and Operation letter (107) 2042, July 11, 1991
- (l) Registered Construction and Operation letter (107) 2170, October 23, 1991
- (m) Registered Construction and Operation letter CP 107-2431, March 12, 1992
- (n) Construction Permit CP 107-2726, February 26, 1993
- (o) Construction Permit CP 107-2917, April 6, 1993
- (p) Operation Permit Validation CP 107-2726, April 27, 1993
- (q) Construction Permit CP 107-2853, June 9, 1993
- (r) Operation Permit Validation CP 107-2917, August 11, 1993
- (s) Operation Permit Validation CP 107-2853, November 18, 1994
- (t) Construction Permit CP 107-4233, April 20, 1995
- (u) Operation Permit Validation CP 107-4233, June 30, 1995

- (v) Registered Construction and Operation letter CP 107-4640, August 1, 1995
- (w) Operation Permit Validation CP 107-4233, September 6, 1995
- (x) Construction Permit CP 107-5666-00010, July 24, 1996
- (y) Resource Review RR107-8861-00052, October 13, 1997
- (z) Administrative Amendment A107-10512-0052, March 15, 1999

South Plant:

- (a) Construction Permit PC (54) 864, June 24, 1975
- (b) Construction Permit PC (54) 1398, June 18, 1979
- (c) Registered Construction and Operation letter, October 3, 1983
- (d) Registered Construction and Operation letter, April 25, 1984
- (e) Registered Construction and Operation letter, April 25, 1984
- (f) Registered Construction and Operation letter, August 20, 1986
- (g) Registered Construction and Operation letter, February 2, 1987
- (h) Construction Permit PC (54) 1740, April 5, 1989
- (i) Operation Permit 54-11-93-0146, May 1, 1989
- (j) Operation Permit 54-11-93-0136, November 8, 1989
- (k) Operation Permit 54-11-93-0137, November 8, 1989
- (l) Operation Permit 54-11-93-0138, November 8, 1989
- (m) Construction Permit PC (54) 1853, October 20, 1990
- (n) Operation Permit Validation PC (54) 1853, May 15, 1991
- (o) Registered Construction and Operation letter (107) 2045, October 17, 1991
- (p) Construction Permit CP 107-2478, June 17, 1992
- (q) Operation Permit Validation CP 107-2478, January 8, 1993
- (r) Registered Construction and Operation letter CP 107-2901, February 24, 1993
- (s) Registered Construction and Operation letter CP 107-2947, April 23, 1993
- (t) Registered Construction and Operation letter CP 107-3433, January 21, 1994
- (u) Exempt Construction and Operation letter CP 107-4781, September 28, 1995
- (v) Administrative Amendment A-107-5395-00050, March 22, 1996
- (w) Administrative Amendment A-107-8327-00011, April 3, 1997

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

North Plant:

- (a) OP 54-11-93-0139 issued on November 8, 1989

Presses: CCB-200, CMW-275, CSR-281

Reason not incorporated: Presses removed prior to finalization of OP54-11-93-0139

Presses: CSR-282, CSR-283, CSR-284

Reason not incorporated: Presses removed after submission of Title V application

- (b) PC (54) 1257 issued on July 11, 1978 (Press 287 and Press 288)

Condition 5: That the hydrocarbons used will be non-photochemically reactive.

Condition 6: That the increase of hydrocarbon for this source is projected to be approximately seven tons per year.

Reason not incorporated: Presses 287 and 288 were constructed prior to January 1, 1980 and did not have a PTE greater than 100 tons per year and are not subject to Article 8 rules.

- (c) PC (34) 1285 issued on September 6, 1978 (Press 286)

Condition e: That the hydrocarbons used will be non-photochemically reactive.

Condition f: That the increase of hydrocarbon for this source is projected to be approximately five tons per year from the facility.

Reason not incorporated: Press 286 was constructed prior to January 1, 1980 and did not have a PTE greater than 100 tons per year and is not subject to Article 8 rules.

- (d) Registered Construction and Operation Status letter issued on June 19, 1988 (Press 240)

The permit states that "Any change or modification which may increase the volatile organic compound potential emissions to 25 tons per year or more from the equipment covered in this registration must be approved by OAM before such change may occur.

Reason not incorporated: According to the potential emissions calculations based on the maximum capacity for the press the potential VOC emissions are greater than 25 tons per year. The operating permit did not anticipate that the potential emissions would be greater than 25 tons per year and therefore did not address the requirements of 326 IAC 8-1-6. The source has been restricting operations to not exceed 25 tons per year. The VOC content delivered to the applicator of the press shall be limited such that VOC emitted is less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply. VOC emitted will be based on the following equation:

VOC emissions (tpy)= ink usage X volatile content X 80% flash off + fountain solution usage X volatile content X 100% flash off + cleaner usage X volatile content X 100% flash off

- (e) PC (54) 1746 issued on May 3, 1989 and OP 54-06-93-0167 issued on July 7, 1989

(Press 245)

Condition 1: That the web offset printing press (including dryer), No. CSR 245 shall be limited to a rolling average of 417 hours of operation per month.

Condition 2: That the maximum capacity of this 2 web, 4 unit press shall be:

1. linespeed-1000 feet per minute
2. printing width- 33 inches
3. coverage- 0.25 pounds of ink per million square inches, 40% by weight volatiles in the ink
4. fountain solution usage- 2.5 pounds per million square inches, 2.1% by weight volatiles in the fountain solution
5. cleaner usage- 2010 gallons per year, 100% volatiles in the cleaner
6. dryer- 4.4 million BTU's per hour

Condition 3: That a log of information necessary to document compliance with Condition 1 shall be maintained. These records shall be kept for at least the past 24 month period and made available upon request to the Office of Air Management. A quarterly summary of the monthly hours of press operation shall be submitted to...within 30 days after the end of the quarter being reported. The data shall be submitted in the format attached.

Reason not incorporated: To maintain consistency in permit language, reporting and monitoring, a revised limiting condition will replace the previous conditions. The VOC content delivered to the applicator of the press shall be limited such that VOC emitted is less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply. VOC emitted will be based on the following equation:

VOC emissions (tpy)= ink usage X volatile content X 80% flash off + fountain solution usage X volatile content X 100% flash off + cleaner usage X volatile content X 100% flash off

Descriptions in Title V are for descriptive information and do not constitute enforceable conditions.

- (f) OP 54-11-93-0141 issued on November 8, 1989 (Boilers # 1(N) thru #4(N))

Condition 4: That sulfur dioxide emissions shall be limited to 6.0 pounds per million BTU of heat input pursuant to 326 IAC 7-1.

Reason not incorporated: This limit is for coal combustion and the boilers are natural gas/propane. The boilers are no longer capable of burning #2 fuel oil, so this limit is no longer applicable.

- (g) Registered Construction and Operation Status (107) 2042 issued on July 11, 1991 (Press 232 and Press 233)

The new presses will use an ultraviolet light curing system for the ink which will eliminate volatile organic compounds released from the ink. A less volatile printing aid will be used instead of Isopropyl alcohol. The quantities of printing aid applied will also be reduced. The fountain solution will contain less than 2.5 percent of volatile organic compounds per gallon.

Reason not incorporated: To maintain consistency in permit language, reporting and monitoring, a revised limiting condition will replace the previous conditions. The VOC content delivered to the applicator of the press shall be limited such that VOC emitted is less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the

best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply. VOC emitted will be based on the following equation:

$$\text{VOC emissions (tpy)} = \text{ink usage} \times \text{volatile content} \times 80\% \text{ flash off} + \text{fountain solution usage} \times \text{volatile content} \times 100\% \text{ flash off} + \text{cleaner usage} \times \text{volatile content} \times 100\% \text{ flash off}$$

Descriptions in Title V are for descriptive information and do not constitute enforceable conditions. Amendment 107-10512-00052 dated March 15, 1999 allowed usage of isopropyl alcohol at 750 lb/yr as part of fountain solution.

- (h) Registered Construction No. (107) 2170 and Operation Status issued on October 23, 1991 (press 241)

A less volatile printing aid will be used instead of Isopropyl alcohol. The quantities of printing aid applied will also be reduced. The Fountain solution will contain less than 0.45 percent of volatile organic compound per gallon.

The total VOC emissions from the two webs in the press will be 17.76 tons per year based on 8760 hours of operation.

Reason not incorporated: To maintain consistency in permit language, reporting and monitoring, a revised limiting condition will replace the previous conditions. The VOC content delivered to the applicator of the press shall be limited such that VOC emitted is less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply. VOC emitted will be based on the following equation:

$$\text{VOC emissions (tpy)} = \text{ink usage} \times \text{volatile content} \times 80\% \text{ flash off} + \text{fountain solution usage} \times \text{volatile content} \times 100\% \text{ flash off} + \text{cleaner usage} \times \text{volatile content} \times 100\% \text{ flash off}$$

- (i) CP 107-2726 issued on February 26, 1993 (press 268) and CP 107-2917 issued on April 6, 1993 (press 269),

Condition 5: That static air pressure in the dryer shall be at least 0.25" water lower than the surrounding atmosphere, or a value determined in the stack tests described in Operation Condition 4 above to assure that dryer exhaust leaves through the thermal afterburner.

Condition 7: That the combustion temperature in the thermal afterburner shall not be lower than that noted in condition 4 above as assuring 90% destruction of VOC.

Condition 8: That differential air pressure (from condition 5), cumulative hours of operation for the press, dryer and thermal afterburner (from condition 6), and thermal afterburner combustion temperature (from condition 7) shall be measured at least once each eight hours.

Condition 9: That a log of information necessary to document compliance with conditions 5, 6, 7 and 8 shall be maintained. These records shall be kept for at least the past 24 month period and made available upon request to the Office of Air Management.

Reason not incorporated: In order to regulate all oxidizers within the entire facility on the same parameters, monitoring and reporting schedule to maintain consistency with conditions and compliance with 326 IAC 8-1-6 (BACT) within the facility. Conditions #6:

"That the dryer and the thermal afterburner be operated at all times that the press is operated" and #10: "That the controls of the press, dryer, and thermal afterburner shall be interlocked such that the press and dryer can not be operated until such time that the combustion temperature in the thermal afterburner has attained the minimum temperature determined in (stack testing) to destroy at least 90% of captured VOC" will be incorporated.

- (j) CP 107-2853 issued on June 9, 1993 (In-line stainer 192)

Condition 4: That input of volatile organic compounds (VOC) to in-line coater CFP-192, including clean up solvent, shall be limited to 24 tons per year, based on a twelve month average rolled on a monthly basis. During the first 12 months of operation, VOC input shall be limited such that, total tons applied divided by months of operation shall not exceed an average of 2 tons per month. Therefore, 326 IAC 8-1-6 will not apply.

Condition 6: That a log of information necessary to document compliance with condition No. 4 shall be maintained. These records shall be kept for at least the past 24 month period and made available upon request to the Office of Air Management. A quarterly summary shall be submitted to... within 30 days after the end of the quarter being reported in the format attached. These reports shall include diluent solvent, the gallons of coating applied, tons VOC this month and tons of VOC per last 12 months.

Reason not incorporated: To maintain consistency in permit language, reporting and monitoring, a revised limiting condition will replace the previous conditions. The VOC content delivered to the in-line stainer 192 shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

- (k) Registered Construction and Operation Status CP107-4640 issued on August 1, 1995 (press 220 and press 221)

All permit conditions.

Reason not incorporated: Presses 220 and 221 have been removed from the facility since the Title V application was submitted.

- (l) CP 107-5666-00010 issued July 24, 1996 (press 244)

Entire permit no longer valid.

Reason not incorporated: press CSR-244 was never built. Pursuant to 326 IAC 2-9-1(5) the Commissioner may revoke the permit if construction is not commenced within eighteen (18) months after receipt of the approval or if construction is discontinued for a period of one (1) year or more.

South Plant:

- (a) PC (54) 1398, issued on June 18, 1979

press CHT-292

Reason not incorporated: press CHT-292 has been removed from the facility.

- (b) OP 54-11-93-0136 issued on November 8, 1989 (press 270)

Condition 5: That the aromatic hydrocarbons used will be less than 8% of the total hydrocarbons.

Condition 6: That the increase of hydrocarbons will be less than four (4) tons per year from the facility.

Condition 7: That the hydrocarbon used will be more than 90% nonphotochemically reactive.

Reason not incorporated: press 270 was constructed prior to January 1, 1980 and did not have a PTE greater than 100 tons per year and is not subject to Article 8 rules.

- (c) Registered Construction and Operation Status, issued on August 20, 1986 and OP 54-11-93-0136 issued on November 8, 1989 (press 260)

Condition 1: That in order to limit Volatile Organic Compound (VOC) emissions from press CSM-260 to less than 25 ton per year, running time on that press shall be limited to 5000 hours per year.

Condition 2: That in order to document compliance with condition (1), records of running hours on press CSM-260 shall be kept for at least the past twenty-four (24) -month period. A written quarterly summary of these records shall be supplied to the Office of Air Management, no later than 30 days after the end of each calendar quarter.

Reason not incorporated: To maintain consistency in permit language, reporting and monitoring, a revised limiting condition will replace the previous conditions. The VOC content delivered to the applicator of the press shall be limited such that VOC emitted is less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply. VOC emitted will be based on the following equation:

VOC emissions (tpy)= ink usage X volatile content X 80% flash off + fountain solution usage X volatile content X 100% flash off + cleaner usage X volatile content X 100% flash off

- (d) Registered Construction and Operation Status, issued on February 2, 1987 and OP 54-11-93-0136 issued on November 8, 1989 (press 261)

Condition 1: That in order to limit Volatile Organic Compound (VOC) emissions from press CSM-261 to less than 25 ton per year, running time on that press shall be limited to 5000 hours per year.

Condition 2: That in order to document compliance with condition (1), records of running hours on press CSM-261 shall be kept for at least the past twenty-four (24) -month period. A written quarterly summary of these records shall be supplied to the Office of Air Management, no later than 30 days after the end of each calendar quarter.

Reason not incorporated: To maintain consistency in permit language, reporting and monitoring, a revised limiting condition will replace the previous conditions. The VOC content delivered to the applicator of the press shall be limited such that VOC emitted is less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply. VOC emitted will be based on the following equation:

VOC emissions (tpy)= ink usage X volatile content X 80% flash off + fountain solution usage X volatile content X 100% flash off + cleaner usage X volatile content X 100% flash off

- (e) PC (54) 1740 issued April 5, 1989 and OP 54-11-93-0146 issued on May 1, 1989 (press press-293)

Condition 1: That the Web Offset Printing press, No. CHT-293 shall be limited to a rolling 12 month average of 434 hours of operation per month.

Condition 2: Maximum capacity of this 2 web, 4 unit press shall be:

1. linespeed- 1000 feet per minute
2. printing width- 32 inches
3. coverage- 0.25 pound of ink per million square inches, 40% by weight volatiles in the ink
4. fountain solution usage- 2.5 pounds per million square inches, 2.1% by weight volatiles in the fountain solution
5. cleaner usage- 2048 gallons per year, 100% volatiles in the cleaner

Reason not incorporated: To maintain consistency in permit language, reporting and monitoring, a revised limiting condition will replace the previous conditions. The VOC content delivered to the applicator of the press shall be limited such that VOC emitted is less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply. VOC emitted will be based on the following equation:

VOC emissions (tpy)= ink usage X volatile content X 80% flash off + fountain solution usage X volatile content X 100% flash off + cleaner usage X volatile content X 100% flash off

Descriptions in Title V are for descriptive information and do not constitute enforceable conditions.

- (f) OP 54-11-93-0136 issued November 8, 1989
press CHT-292

Reason not incorporated: press removed from facility since Title V application submitted.

- (g) OP 54-11-93-0137 issued on November 8, 1989
Press CSM-278 and CSM-279

Reason not incorporated: press removed from facility since Title V application submitted.

- (h) OP 54-11-93-0138 issued on November 8, 1989 (Boilers #1(S) thru #3(S))

Condition 4: That sulfur dioxide emissions shall be limited to 6.0 pounds per million BTU of heat input pursuant to 326 IAC 7-1.

Reason not incorporated: This limit is for coal combustion and the boilers are natural gas/propane. The boilers are no longer capable of burning #2 fuel oil, so this limit is no longer applicable.

- (i) PC (54) 1853 issued on October 20, 1990 and Operation Permit Validation CP (54) 1853 issued on May 15, 1991 (Press 273)

Condition 4: That press 273 shall be limited to a rolling 12 month average of 9.28 million impressions per month (112.2 million impressions per year). This will limit emission of volatile organic compounds (VOC) to 24.9 per year. As a result of this limitation, state and federal rules for the Prevention of Significant Deterioration, and state

rule 326 IAC 8-1-6 do not apply.

Condition 5: That the limit in Condition 4 is based on 50% ink (32% VOC) coverage per impression, 100% fountain solution (1.8% VOC) coverage and an equivalent of 25% cleaning solvent (100% VOC) coverage. Prior to making any change which would result in an increase in emissions of VOC, this change must be approved by the Office of Air Management.

Condition 6: That a log of information necessary to document compliance with condition 4 shall be maintained. These records shall be kept for at least the past 24 month period and made available upon request to the Office of Air Management. These records shall include the number of impressions made by press -273 each month. A quarterly summary shall be submitted within 30 days after the end of the quarter being reported.

Reason not incorporated: To maintain consistency in permit language, reporting and monitoring, a revised limiting condition will replace the previous conditions. The VOC content delivered to the applicator of the press shall be limited such that VOC emitted is less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply. VOC emitted will be based on the following equation:

VOC emissions (tpy)= ink usage X volatile content X 80% flash off + fountain solution usage X volatile content X 100% flash off + cleaner usage X volatile content X 100% flash off

- (j) Registered Construction No. (107) 2045 issued on October 17, 1991 (Press 294)

The new press will print at a maximum rate of 24.79 million square inches/hour with the capacity to apply:

- a) 10.9 pound/hour (0.44 pounds of ink per million square inches) containing 38% solvent (volatile organic compounds, VOC) ink
- b) 154 pounds/hour of fountain solution (contain less than 1% VOC),
- c) 0.59 pounds per running hour of clean-up solvent (100% VOC)

Any change or modification which may increase the potential emissions to more than 25 tons per year of volatile organic compounds from the presses covered in this letter must be approved by the Office of Air Management before such change may occur.

Reason not incorporated: According to the potential emissions calculations based on the maximum capacity for the presses the potential VOC emissions are greater than 25 tons per year. The source has been restricting hours to keep the VOC emissions less than 25 tons per year. To maintain consistency in permit language, reporting and monitoring, a revised limiting condition will replace the previous conditions. The VOC content delivered to the applicator of the press shall be limited such that VOC emitted is less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply. VOC emitted will be based on the following equation:

VOC emissions (tpy)= ink usage X volatile content X 80% flash off + fountain solution usage X volatile content X 100% flash off + cleaner usage X volatile content X 100% flash off

Descriptions in Title V are for descriptive information and do not constitute enforceable conditions.

- (k) CP 107-2478 issued on June 17, 1992 and Operation Permit Validation Construction

Permit No. CP107-2478 issued January 8, 1993 (Press 262)

Condition 4: That the thermal afterburner shall be operated whenever the presses are in operation, and that the incineration temperature shall be maintained at or above 1350 F to insure a minimum 90% destruction efficiency. Satisfaction of this condition, in conjunction with condition No. 6 below, will be viewed as complying with the requirements of 326 IAC 8-1-6 (BACT).

Condition 5: That a log of information necessary to document compliance with condition No. 4 shall be maintained. These records shall be kept for at least the past 24 month period and made available upon request to the Office of Air Management.

Reason not incorporated: In order to regulate all oxidizers within the entire facility on the same parameters, monitoring and reporting schedule to maintain consistency with conditions and compliance with 326 IAC 8-1-6 (BACT) within the facility. Condition 6: "That the overall capture and control efficiency of the thermal afterburner shall be no less than 90%" will be revised to clarify that a 90% destruction efficiency and 100% capture of the ink oil is required.

- (l) Registered Construction and Operation Status issued on February 24, 1993 (press -259)

Entire permit no longer valid.

Reason not incorporated: press CHT-259 removed after submission of Title V.

- (m) Registered Construction and Operation Status CP107-2947 issued April 23, 1993 (Press 295)

Capacity: 396,000 square inches per minute (1000 feet per minute line speed by 33 inches maximum print width) press shall be referred to as -295.

Reason not incorporated: To maintain consistency in permit language, reporting and monitoring, a revised limiting condition will replace the previous conditions. The VOC content delivered to the applicator of the press shall be limited such that VOC emitted is less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply. VOC emitted will be based on the following equation:

$$\text{VOC emissions (tpy)} = \text{ink usage} \times \text{volatile content} \times 80\% \text{ flash off} + \text{fountain solution usage} \times \text{volatile content} \times 100\% \text{ flash off} + \text{cleaner usage} \times \text{volatile content} \times 100\% \text{ flash off}$$

Descriptions in Title V are for descriptive information and do not constitute enforceable conditions.

- (n) Registered Construction and Operation Status CP 107-3433 issued January 21, 1994 (Press 296)

One (1) heatset web offset lithographic printing press, referred to as CHT-296. Capacity: 860 feet per minute by 31 inch maximum printing width. Two (2) natural gas fired ink dryers. Heat input capacity of each dryer: 4,400,000 Btu per hour.

Reason not incorporated: To maintain consistency in permit language, reporting and monitoring, a revised limiting condition will replace the previous conditions. The VOC content delivered to the applicator of the press shall be limited such that VOC emitted is less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities:

General Reduction Requirements) does not apply. VOC emitted will be based on the following equation:

VOC emissions (tpy)= ink usage X volatile content X 80% flash off + fountain solution usage X volatile content X 100% flash off + cleaner usage X volatile content X 100% flash off

Descriptions in Title V are for descriptive information and do not constitute enforceable conditions.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on May 30, 1996.

A notice of completeness letter was mailed to the source on February 10, 1997.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	greater than 250
PM-10	greater than 250
SO ₂	greater than 100
VOC	greater than 250
CO	less than 100
NO _x	greater than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC, PM10, SO₂, and NO_x are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7-1.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1998 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	No data
PM-10	No data
SO ₂	0.00
VOC	165.0
CO	8.0
NO _x	14.0
HAP (specify)	No data

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAP
Press 240	-----	-----	-----	less than 25	-----	-----	-----
Press 241	-----	-----	-----	less than 25	-----	-----	-----
Press 245	-----	-----	-----	less than 25	-----	-----	-----
Press 242 and Press 243	-----	-----	-----	39.0* combined (less than 25 each)	-----	-----	-----
Press 289	-----	-----	-----	less than 25	-----	-----	-----
Press 232 and Press 233	-----	-----	-----	less than 25 combined	-----	-----	-----
Press 238	-----	-----	-----	less than 25	-----	-----	-----
Press 239	-----	-----	-----	less than 25	-----	-----	-----
Press 273	-----	-----	-----	less than 25	-----	-----	-----
Press 260	-----	-----	-----	less than 25	-----	-----	-----
Press 261	-----	-----	-----	less than 25	-----	-----	-----
Press 290	-----	-----	-----	less than 25	-----	-----	-----
Press 291	-----	-----	-----	less than 25	-----	-----	-----
Press 293	-----	-----	-----	less than 25	-----	-----	-----
Press 294	-----	-----	-----	less than 25	-----	-----	-----
Press 295	-----	-----	-----	less than 25	-----	-----	-----
Press 296	-----	-----	-----	less than 25	-----	-----	-----
In-line stainer 192	-----	-----	-----	less than 25	-----	-----	-----

*Pursuant to CP 107-4233 issued April 20, 1995

County Attainment Status

The source is located in Montgomery County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Montgomery County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Montgomery County has been classified as attainment or unclassifiable for VOC and PM10. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source. Subpart Dc-Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units does not apply because all of the facility boilers were constructed prior to June 9, 1989.
- (b) The printing presses of this source are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.430, Subpart QQ (Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing), because none to the presses are rotogravure printing presses.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source. Subpart T-National Emission Standards for Halogenated Solvent Cleaning doe not apply to the insignificant degreasing operations because there are not halogenated solvents used.
- (d) The printing presses of this source are not subject to 40 CFR Part 68.820, Subpart KK-National Emission Standard for the Printing and Publishing Industry. This standard applies to sources of hazard air pollutants (HAPs) at which publication rotogravure, product and packing rotogravure, or wide-web flexographic printing. The presses are not rotogravure or flexographic.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on May 30, 1996. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC and PM₁₀. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating)

Particulate limitations for Boiler #1(N) (SB-4A(N)), Boiler #2(N) (SB-4B(N)), Boiler #3(N) (SB-4C(N)), Boiler #4(N) (SB-4D(N)), Boiler #5(N) (SB-4E(N)), Boiler #1(S) (SB-4A(S)), Boiler #2(S) (SB-4B(S)) and Boiler #3(S) (SB-4C) shall be 0.3315 pound particulate matter/MMBtu. Compliance with this limitation is confirmed based on the total PM emission factor for natural gas fired boilers as found in Table 1.4-2 of Supplemental D, March 1998, to the 5th Edition of AP-42, January 1995, of 7.5 pounds per million cubic feet of gas burned.

326 IAC 6-3-2 (Process Operations)

Particulate emission limitations for Paper Trim Cyclone #1(N) (SBP-5H(N)), Paper Trim Cyclone #2(N) (SBP-5I(N)), Paper Trim Cyclone #3(N) (SBP-5J(N)), Trim Cyclone #4(N) (SBP-5K(N)), Paper Trim Cyclone #1(S) (SBP-5E(S)), Paper Trim Cyclone #2(S) (SBP-5E(S)), Paper Trim Cyclone #3(S) (SBP-5E(S)) and Paper Trim Cyclone #4(S) (SBP-5E(S)) shall be 10.4 pounds per hour. Compliance will be demonstrated based on an EF of one pound of dust emitted per ton of paper handled,

Particulate emission limitation for Dust Collector #1(N) (SD-6A(N)), Dust Collector #2(N) (SD-6B(N)), Dust Collector #3(N) (SD-6C(N)), Dust Collector #1(S) (SD-6A(S)) and Dust Collector #2(S) (SD-6B(S)) shall be 0.551 pound per hour per Dust Collector which shall be achieved by the use of baghouse pollution control devices.

The particulate matter (PM) overspray from in-line stainer 192 shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

The dry filters shall be in operation at all times the in-line stainer (192) is in operation, in order to comply with this limit.

326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations)

Sulfur content limitations for Boiler #1(N) (SB-4A(N)), Boiler #2(N) (SB-4B(N)), Boiler #3(N) (SB-4C(N)), Boiler #4(N) (SB-4D(N)), Boiler #5(N) (SB-4E(N)), Boiler #1(S) (SB-4A(S)), Boiler #2(S) (SB-4B(S)) and Boiler #3(S) (SB-4C(S)) are no longer applicable, because they are not capable of burning #2 fuel oil.

326 IAC 8-1-6 (General Reduction Requirements)

This rule applies to new facilities as of January 1, 1980, that have potential VOC emissions of 25 tons per year or greater if no specific rule in Article 8 is applicable.

Press 285, press 286, press 287, press 288, press 270, press 272, press 274, press 276 and press 254 have no applicable Article 8 rules because the presses were constructed prior to January 1, 1980 and PTE is less than 100 tons per year.

Press 240, press 241, press 245, press 242, press 243, press 289, press-232, press-233, press 238, press 239, press 273, press 260, press 261, press 290, press 291, press 293, press 294, press 295, press 296 and in-line stainer 192 have VOC limited to less than twenty-five (25) tons per year, therefore 326 IAC 8-1-6 is not applicable.

Press 268 and press 269 will be controlled by a 7.6 MMBtu/hr natural gas thermal oxidizer. Press 262 will be controlled by a 1.894 MMBtu/hr natural gas fired thermal oxidizer. The thermal oxidizers shall be in operation at all times during which any of the presses are in operation. This control maintained at a minimum destruction efficiency of 90% is considered Best Available Control Technology (BACT) pursuant to 326 IAC 8-1-6.

326 IAC 8-2-5 (Paper Coating)

326 IAC 8-2-5 is intended to apply to paper coating operations such as adhesive tapes; adhesive labels; decorated, coated and glazed paper; book covers; office copier paper; carbon paper; typewriter ribbons and photographic films. Paper coating means 100% coverage or saturation.

326 IAC 8-2-5 does not apply to the In-line stainer 192 because it is an edge staining operation and cannot provide 100% coverage or saturation.

Since lithographic printing operations do not involve 100% coverage, they are not subject to this rule.

326 IAC 8-3-1 (Organic Solvent Degreasing Operation)

Does not apply to the source, because degreasing operation was installed prior to January 1, 1980.

326 IAC 8-5-5 (Graphic Arts Operation)

Does not apply to the presses at this source, because they are not rotogravure or flexographic.

326 IAC 8-6 (Organic Solvent Emission Limitations)

Press 270, press 276, press 285, press 286, press 287 and press 288 are not subject to the requirements of 326 IAC 8-6 because although, they were in operation after October 7, 1974 and prior to January 1, 1980, the PTE for VOC was less than 100 tons per year.

Press 272, press 274 and press 254 are not subject to the requirements of 326 IAC 8-6 because they were in operation prior to October 7, 1974.

The requirements of 326 IAC 8-6 does not apply to any of the remaining presses because they were installed after January 1, 1980 and are not located in Lake or Marion Counties.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The Paper Trim Cyclones and Paper Dust Collectors for the north and south plants have applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emission notations of the Baghouse stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
 - (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
 - (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
 - (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
 - (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
 - (f) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the Paper Dust Cyclones, at least once weekly when the Paper Dust Cyclones are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 3.0 and 6.0 inches of water or a range

established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

- (g) An inspection shall be performed each calendar quarter of all bags controlling the Paper Dust Cyclones when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
 - (h) In the event that bag failure has been observed:
 - (1) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
 - (2) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
2. The In-line stainer for the north plant has applicable compliance monitoring conditions as specified below:
- (a) Daily inspection shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while in operation of the following:
 - (1) not visibly detectable at the exhaust;
 - (2) not accumulated on the rooftops or on the ground, or
 - (3) not causing any nuisance problems.
 - (b) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
3. The thermal oxidizers for the north and south plants have applicable compliance monitoring conditions as specified below:
- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizers for measuring operating temperature.

The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.

- (b) The duct pressure or fan amperage shall be observed at least once per week when the thermal oxidizer is in operation. This pressure or amperage shall be maintained within the range as established in most recent compliant stack test.
- (c) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above established range for any one reading.

Air Toxic Emission

This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act.

Conclusion

The operation of this book printing and binding operation shall be subject to the conditions of the attached proposed Part 70 Permit No. T107-5963-00052.